

LSDN Safeguarding Policy	
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1. Introduction

London Skills & Development Network (LSDN) recognises its statutory and moral duty towards safeguarding the welfare of children, young people and adults at risk from any form of abuse whilst receiving education and training. We expect all staff, volunteers and partners to endorse and practice this duty at all times. As a result, we have a zero-tolerance approach to abuse and other harmful behaviour. At LSDN safeguarding and promoting the welfare of children, young people and adults at risk is everyone's responsibility.

2. Purpose

At LSDN we are committed to safeguarding and promoting the welfare of all learners, staff, volunteers, visitors, contractors and partners. Any reference in the policy to a child or young person applies to all those aged under 18. Our legal duty includes the education and training of adults at risk. Any reference in the policy to an adult at risk applies to anyone aged over 18 years who may for a variety of reasons be in need of community services and/or unable to protect him or herself from significant harm or exploitation.

LSDN has developed procedures in line with, and taking account of, guidance issued by the Department for Education, Leaders in Safeguarding and other relevant bodies. We operate in line with the requirements of the local authority (London Borough of Croydon) safeguarding arrangements.

Whilst overall responsibility for safeguarding children, young people and vulnerable adults is vested in the Chief Executive Officer; LSDN has a named Designated Safeguarding Lead (DSL) and Designated Safeguarding Officers who are responsible for ensuring compliance to this policy and its procedures. The role and responsibilities and contact details of the DSL and DSO's can be found in section 4 and Appendix 2.

3. Scope

This policy applies to all learners and particularly children, young people and adults who may need support and all staff, volunteers, partners and families visiting and working at our centres, other external facilities, in the workplace, distance learning and subcontractors.

In order to help ensure that children, young people and adults at risk are protected from abuse, all complaints, allegations or suspicions will be taken seriously and in accordance with this policy detailed herein.

LSDN has incorporated child protection into the whole organisational approach to safeguarding and the term safeguarding is deemed to include child protection in all our policies and procedures.

The Legal Framework for the Role of LSDN is as follows:

The Children's Act 2014

This is fundamental to people working with children and young adults in the UK.

The Protection of Children Act 1999

Requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children and young people.

The Education Act 2002

Requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people.

The Sexual Offences Act 2003

It is an offence for a person over 18 (e.g. a lecturer or other staff member) to have a sexual relationship with a child under 18, even if the relationship is consensual. It applies where the child is in education, and the person works in the organisation as the child, even if she or he does not teach the child.

The Education Act 2002 - Section 157 & 175

Requires local authorities and governing bodies of further education institutions to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children, young people and adults at risk. In addition, they should have regard to any guidance issued by the Secretary of State in considering what arrangements they may need to make.

Keeping Children Safe in Education (2022)

It is a statutory guidance from the Department of Education. It sets out the safeguarding statutory responsibilities of schools and colleges, as well as good practice recommendations in relation to children. Schools and colleges must refer to it when carrying out their duties to safeguard and promote the welfare of children. It covers the relevant legislation; the responsibilities of Governing Bodies and Principals; safer recruitment practice; recruitment and vetting checks; dealing with allegations of abuse or misconduct against staff; and also, checklists, flowcharts and examples.

Working Together to Safeguard Children (2018)

Provides statutory guidance on the roles and responsibilities of agencies working together to safeguard children/young people. In addition, it sets out the framework for the formation of Safeguarding Partnerships and details the allegation management process. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. Access is allowed for children's social care from the local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding

procedures set up by Safeguarding Partnerships.

Safeguarding Vulnerable Groups Act 2006

The Disclosure and Barring Service (DBS) has been introduced to help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

DFE Statutory Guidance

Provides guidance on making arrangements to safeguard and promote the welfare of children under section 11 of the Children Act 2004. The guidance plays an important role in embedding this responsibility in the work of key agencies which have contact with children and young people. It reflects the recognition that protecting children from harm cannot be separated from policies to improve children's lives as a whole.

Protection of Freedoms Act (2012) Part 5 – Safeguarding Vulnerable Groups, Criminal Records etc.

Covers the reduction in scope of the definition of regulated activity, new services provided by the DBS, and disregarding convictions and cautions for consensual gay sex.

FGM Act 2003 Section 5B introduces a mandatory reporting duty that requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s that they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2018)

This guidance highlights the advice to prevent and deal with sexual violence and sexual harassment between students.

Mental Capacity Act (2005)

Provides a way in which people who may need help to make decisions can get that help from someone who can be trusted to act in their best interests. Mental Capacity under the Act means being able to make your own decisions. The Mental Capacity Act and its Code of Conduct contain a set of rules, procedures and guidance. The Act applies in full to those aged 18 or over, the entire Act except making Power of Attorney or Making a Will applies to 16 and 17-year olds. The Act only applies to those under 16 in very limited circumstances and these would have to be determined by a court.

The Counter-Terrorism & Security Act (2015) and The Prevent Duty

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people from becoming terrorists or supporting terrorism. The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.

4. Duties

4.1. The Role of the Safeguarding Board

The Safeguarding Board is committed to ensuring that LSDN:

- raises awareness of issues relating to safeguarding and promotes the welfare of all;
- provides a safe environment for children, young people and adults at risk;
- identifies those who are suffering or at risk of suffering significant harm and takes appropriate action to ensure they are kept safe;
- has procedures for reporting and dealing with allegations of abuse against members of staff and volunteers;
- operates safe recruitment procedures;
- designates a member of staff with sufficient authority to take a lead role for safeguarding;
- remedies any weaknesses and areas for improvement relating to safeguarding that are brought to their attention;
- ensure all staff members receive appropriate child protection and safeguarding training which is regularly updated;
- ensure all staff will have an understanding of what radicalisation and extremism is and why the need to be vigilant.

4.2. The Role of Staff

4.2.1. Staff Member with Lead Responsibility

There is a designated member of staff with lead responsibility for safeguarding issues. The key responsibility of that member of staff is to lead on raising staff awareness concerning all issues relating to safeguarding, and to promote LSDN as a safe environment for learning and being cared for. They have received the appropriate training as required by the legislation and sector best practice and will maintain the currency of their knowledge on safeguarding issues. The Designated Safeguarding Lead (DSL) is responsible for:

- overseeing the referral of cases of suspected abuse or allegations;
- giving advice and support to staff on matters relating to safeguarding;
- maintaining a proper record of any safeguarding referral, complaint or concern received;
- ensuring that all staff, students, partners, stakeholders and adults at risk and those who support them are aware of the safeguarding policy;
- ensuring that the teaching staff, in conjunction with the Student Wellbeing team, know their students who are vulnerable adults due to experiencing domestic abuse, mental health history, substance misuse or criminal background;
- supporting and advising to staff during the referrals processes;
- liaising with other agencies as necessary;
- ensuring there is liaison with employers and training organisations providing learners with placements to ensure proper safeguarding arrangements are in place;
- ensuring that all staff receive training about safeguarding matters

- and the procedures;
- providing termly reports to the Safeguarding Board;
- reporting any flaws in procedure to the Safeguarding Board as soon as possible;
- keep detailed, accurate, secure written records of concerns and referrals;
- storing all information and recording in a secure manner and in accordance with Data Protection Act 2018 (GDPR);
- dealing with individual cases, including attending case conferences and review meetings as appropriate;
- having received training in safeguarding issues and inter-agency working, as required by the Safeguarding Partners, and will receive refresher training at least every 2 years.

4.2.2. All Staff

The CEO, members of the Board, members of the Senior Management Team and all staff will receive training to familiarise them with safeguarding issues and the policy and procedures, with refresher training at least every two years. A Staff Safeguarding Handbook is also accessible digitally and placed at reception. A section of the Handbook is also discussed weekly with staff.

5. Definitions and Concepts

5.1. Child

Within the context of this policy a “child” is defined as anyone under the age of 18 (the Children Act 1989, Education Act 2002). Further, the additional duties regarding support, protection and safeguarding also extends to learners within the 14 to 16 age range from local schools.

5.2. Adult at Risk

It is recognised within this policy that any adult may be vulnerable or become a victim of abuse. Specifically, an “adult at risk” is defined as any person who is 18 years of age or over and has a reduced capacity to give consent to disclosure of abuse allegations or suspicions. As defined by the Law Commission (1995) we use the following indicators to identify an adult who is, or may become “at risk” whilst they are registered with us:

The Individual:

- i. is or may be in need of community care services by reason of mental or other disability, age or illness;
- ii. is or may be unable to take care of himself or herself;
- iii. is unable to protect himself or herself against significant harm or serious exploitation.

Whilst not definitive, the main categories of people covered by the definition of “adult at risk” include those who:

- i. have a learning disability;
- ii. have a physical or sensory impairment;
- iii. have a mental illness including dementia;

- iv. are old and frail;
- v. are detained in custody or under a probation order;
- vi. are considered vulnerable and who may experience abuse due to problems with alcohol or drugs (or be vulnerable due to other circumstances such as being an asylum seeker).

5.3. Children in Need of Protection and Early Help

Some children and young people are in need because they are suffering or likely to suffer “significant harm”. Where local authorities believe a young person is suffering, or likely to suffer, significant harm, they have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a young person, this can be done through contacting the local authority early help team to share concerns and ensure the early identification of needs within families.

5.4. Children in Need

Children and young people who are defined as being “in need” under Section 17 of the Children Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of service(s). A child with a disability is a child in need.

5.5. Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We will ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe. The appropriate staff will have the information they need in relation to a child’s looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child’s care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated teacher/person for looked after children will ensure that the designated safeguarding coordinator will have details of the child’s social worker and the name of the virtual school head in the authority that looks after the child.

5.6. Significant Harm

The concept of significant harm is the threshold that justifies compulsory intervention into family life in the best interests of the child or young person and gives local authorities a duty to make enquiries as to whether to take action (Section 47, Children Act 1989) to safeguard or promote the welfare of a young person who is suffering, or likely to suffer significant harm. The Act also gives powers to the police to take emergency action to protect a young person from significant harm.

5.7. Abuse

“Abuse” relates to the mistreatment of an individual’s human and civil rights by any other person or persons and may consist of single or repeated

acts. Incidents of abuse can be either to one person or more than one person at a time. Abuse and/or harmful behaviours can be either deliberate or the result of negligence, ignorance, lack of training, knowledge or understanding. Somebody may abuse or neglect an individual by inflicting harm or by failing to prevent harm.

Within the context of this policy, LSDN recognises the following as definitions of abuse and harmful behaviour. However, it is important to note that this list is not exhaustive:

- i. **Physical:** this may involve hitting, slapping, pushing, kicking, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, misuse of medication, inflicting inappropriate physical sanctions, or otherwise causing physical harm to a child, young person or vulnerable adult including fabricating the symptoms of, or deliberately causing the individual ill health (DfE 2014, DoH 2000).
- ii. **Emotional/psychological:** this is the persistent emotional ill-treatment of a child, young person or vulnerable adult such as to cause severe and persistent adverse effects on their emotional development. This may involve the imposition of age or developmentally inappropriate expectations resulting in fear, exploitation or corruption. This may also include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Threats of harm or abandonment; humiliation; blaming; intimidation; coercion; harassment; verbal abuse, bullying (including cyberbullying) and being prevented from receiving services or support are all forms of emotional abuse (DoH 2000). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- iii. **Sexual:** such as rape, sexual assault or sexual acts occurring through force or enticement and which a child, young person or vulnerable adult could not have consented to, or to which they were pressurised into consenting. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities such as involving the child, young person or vulnerable adult in looking at, or in the production of, pornographic material, watching sexual activities or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (DoH 2000).
- iv. **Neglect or acts of omission:** this includes the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or

psycho-social needs, and which are likely to result in a serious impairment of the individual's health or development. This may include failing to provide adequate food, shelter and clothing, or educational services and/or neglect of, or unresponsiveness to, a child, young person or vulnerable adult's basic emotional needs (DoH 2000).

- v. **Financial or material:** this may include theft, fraud, and exploitation, pressure in connection with money or material possessions. This may also include loss of jewellery or personal property, loss of money from a wallet or purse (DoH 2000).
- vi. **Discriminatory:** this may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or sexual orientation (DoH 2000).

5.8 Safeguarding

It is a term which is broader than 'child protection' and relates to the action taken to promote the welfare of children, young people and vulnerable adults and protect them from harm.

5.9 Children and Young People

Throughout the document, references are made to 'children and young people'. These terms are interchangeable and refer to children who have not reached 18.

5.10 Staff

This includes any adult who is employed, contracted or commissioned to work with children or young people, including agency/supply staff/volunteers and guest speakers, paid or unpaid.

5.11 Child Protection Lead

A senior member of staff with overall responsibility for children protection within the organisation.

5.12 Duty of Care

The duty which rests upon an individual or organisation to ensure that safety of a child or young person involved in any activity or interaction for which that individual or organisation is responsible.

5.11 External Agencies

This includes Children's Services, Adult Services, Independent Safeguarding Authority, Local Safeguarding Partners, Police, Youth Offending Team etc.

5.12 External Contractors

This includes building or maintenance contractors who are required to work at the organisation for a given period of time.

5.13 Vulnerable Adult

Someone aged 18 or over: who is, or may be, in need of community services due to age, illness or a mental or physical disability, unable to take care of

himself/herself or unable to protect himself/herself against significant harm or exploitation.

6. Radicalisation and Acts of Terrorism

The Counter Terrorism & Security Act (2015) and The Prevent Duty

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;
- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support;
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far-right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes. The Home Office uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country;
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers;
- funding a specialist police unit which works to remove online content that breaches terrorist legislation;
- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations;
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

This Act places a duty on specified authorities including skills training, further and higher education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty).

LSDN is committed to supporting vulnerable students through its safeguarding

policies and procedures and recognises that this can support the contribution to the Prevent duty. LSDN has a dedicated Prevent Strategy, Risk Assessment and Action Plan.

7. Management of Processes

7.1. Dealing with disclosure of abuse and procedure for reporting concerns

A member of staff may suspect that a learner is being abused or is at risk of significant harm. A learner may disclose to a member of staff that s/he is being abused.

In these circumstances the following procedure should be followed.

7.1.1. Significant Concerns

If a member of staff has concerns about a learner but does not believe that they are being abused or are at risk of immediate harm, the member of staff should:

- Speak to the learner about the concerns;
- Speak to a Designated Safeguarding Lead who will consider and advise whether LSDN should register the concern.

7.1.2. Disclosure of Abuse

If a disclosure is made or abuse is suspected, staff should:

- Listen carefully and stay calm;
- Question without pressure to be sure that what is being said is properly understood by the member of staff;
- Reassure the individual concerned that s/he has done the right thing;
- Explain to the individual who has disclosed that the information must be passed on but only to those who need to know about it. Say who will receive the information;
- Note the main points carefully - what the individual said/did and the questions asked by the member of staff
- Make a note of the date, time and place;
- Complete a Safeguarding Incident / Concern Form.

Staff must not:

- Ask leading questions or put words into the mouth of the disclosing individual;
- Investigate concerns/allegations;
- Promise confidentiality.

7.1.3. Reporting to the DSL

Staff should report concerns, suspicions or disclosures of abuse immediately to the DSL. If they are not available, the report should be made to the Deputy DSL.

7.1.4. Reporting to the CEO

The designated member of staff must notify the CEO as soon as possible and always within 24 hours of a serious disclosure or suspicion being raised.

7.1.5. Contact with External Services

The DSL or CEO (deputising senior manager) must report the matter to children's social care/adult services or the police by phone immediately, followed up by written confirmation or email within 48 hours. Where a request for service form or an early help assessment is completed and sent via email to children's social care, staff can expect a response via email within 48 hours.

A written record of the date and time of the report must be made, and the document should include the name and position of the person to whom the matter is reported. The telephone contact must be confirmed in writing using the appropriate local authority form within 24 hours.

The designated member of staff should note down the details of the discussion about action to be taken to inform the parents/carers, depending on the circumstances. The process for keeping LSDN informed of further action should also be discussed.

7.1.6. Low Level Concerns

As part of LSDN's approach to safeguarding, an open and transparent culture is promoted in which **all** concerns about all adults working in or on behalf of LSDN (including volunteers, contractors and sub-contractors) are dealt with promptly and appropriately. It is a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately.

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 LSDN may have acted in a way that:

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

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

- being over friendly with children or vulnerable adults
- having favourites
- taking photographs of children or vulnerable adults on their personal mobile phone, contrary to LSDN policy
- engaging with a child or vulnerable adult on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children, students or vulnerable adults.

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

to enable abuse.

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

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

See Appendix 14 Low-Level Concerns for more information.

7.1.7. Confidential Reporting

A whistleblowing and safeguarding scheme is available to all staff employed by LSDN.

7.2. Procedure for Managing Allegations of Abuse Against Staff

LSDN is required to comply with the detailed Safeguarding Partnership's procedure for managing allegations against staff. These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. A summary of LSDN process and procedures is provided in this section, for full details, please refer to LSDN's 'Managing Allegations Against Staff Policy'.

7.2.1. Introduction

In rare instances, staff of education institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of vulnerable adults abuse made against them. LSDN recognises that an allegation of vulnerable adults abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

LSDN recognises that in cases where children are involved, the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the LSDN will do so with sensitivity and will act in a careful, measured way.

7.2.2. Receiving an Allegation

A member of staff who receives an allegation about another member of staff should follow the guidelines for dealing with disclosure.

The allegation should be reported immediately to the Director of Human Resources and CEO. If the Director of Human Resources is the person

against whom the allegation is made, the report should be made to the CEO. The DSL and Director of Human Resources, if the allegation is against the CEO should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the DSL/Director of Human Resources.
- Record information about times, dates, locations and names of potential witnesses.
- Report the allegations to the Chair of the LSDN Governing Body.

7.2.3. Initial Assessment by the Designated Person

The Director of Human Resources should make an initial assessment of the allegation, consulting with the DSL and the relevant local authority's children's Safeguarding Partnerships as appropriate.

An allegation is information which indicates that a person who works with a child, young person or vulnerable adult has:

- behaved in a way that has harmed or may have harmed a child, young person or vulnerable adult;
- possibly committed a criminal offence against or related to a child, young person or vulnerable adult;
- behaved towards a child, young person or vulnerable adult in a way that indicates s/he is unsuitable to work with children, young people and vulnerable adults.

It is important that the Director of Human Resources does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

If the assessment of the allegation is that it requires to be investigated, then an investigation will take place in accordance with the LSDN's disciplinary policy. The local authority designated officer (LADO) will be advised and kept fully informed of progress and outcome.

7.2.4. Enquiries and Investigations

Child protection enquiries by Social Services or the police are not to be confused with internal, disciplinary enquiries by LSDN. LSDN may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct LSDN to act in a particular way however, LSDN should assist the agencies with their enquiries.

LSDN will instigate its own internal enquiries regardless of any formal police or social services investigations but will ensure that this will not prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the DSL and/or Director of Human Resources should normally be involved

in, and contribute to, the inter-agency strategy discussions. The DSL and CEO are responsible for ensuring that LSDN gives every assistance with the agency's enquiries.

He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The DSL (or Director of Human Resources) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

The Director of Human Resources will consult with Social Services, the police or the Children's Integrated Services Safeguarding Team, particularly in relation to timing and content of the information to be provided, and shall:

- inform the learner or parent/carer making the allegation that the investigation is taking place and what the likely process will involve;
- ensure that the parents/carers of the learner making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve;
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve;
- inform the member of staff making the allegation that the investigation is taking place and what the likely process will involve;
- inform LSDN Safeguarding Board of the allegation and the investigation.

The Director of Human Resources shall keep a written record of the action taken in connection with the allegation.

7.2.5. Suspension

Suspension should not be automatic. In respect of staff, other than the CEO or senior post holders, suspension can only be carried out by the nominated member of the senior management team. In respect of senior post holders, suspension can only be carried out by the CEO.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

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

- where a learner is at risk;
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct;
- where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, this will be conducted in accordance with the existing LSDN disciplinary procedures.

7.2.6. The disciplinary investigation

The disciplinary investigation will be conducted in accordance with the existing LSDN disciplinary procedures.

7.2.7. Allegations without foundation

False allegations may be indicative of problems of abuse elsewhere. A record should be kept.

In consultation with the DSL, the CEO shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence. Inform the parents/carers of those involved that the allegation has been made and of the outcome
- where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner (where appropriate)
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken
- in some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details in public information

7.2.8. Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about LSDN's statutory duty to notify the Disclosure and Barring Service.

7.2.9. Confidentiality

LSDN will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a learner from the same school or college (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions will apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes

information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions will also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restriction in response to a request to do so.

7.2.10. Procedures for dealing with children and young people

The overall responsibility for the safeguarding of children and young people is placed on staff to act immediately and appropriately if a disclosure is made. Local Authorities must be informed immediately to ensure a collaborative and transparent approach. The first point of contact is the DSL. This post holder will liaise with the relevant referring agency.

7.2.11. Allegations against students

If there is a concern or allegation raised regarding one student abusing another LSDN's child-on-child abuse guidance and procedures or Bullying and Harassment policy will be actioned and followed by the DSL/DSO as applicable and in line with the ages of the students involved. .

8. Safer Recruitment and Selection Procedures

LSDN has in place robust recruitment procedures which ensure that care is taken to protect young or vulnerable learners. The procedures apply to all staff and volunteers and they are reviewed regularly to take account of following principles:

- A curriculum vitae (CV) is only accepted alongside a full application form.
- Safer recruitment policies are in place, embedded and effective.
- Those involved with the recruitment and employment of staff to work with children have received safer recruitment training.
- At least one of the persons who conducts an interview has completed safer recruitment training.
- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in such a way as to ensure a diversity of applicants.
- Requirement of documentary evidence of academic and vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history including the explanation of any gaps.
- Social media background checks are conducted for every successful applicant, prior to issuing a job offer.
- All offers of appointment are conditional until satisfactory completion of mandatory pre-employment checks listed below:
 - Verification of a candidate's identity; best practice is checking the name on their birth certificate
 - Obtain (via the applicant) an enhanced DBS check (including children's barred list information). When using the DBS update service LSDN obtains the original physical certificate
 - Verify the candidate's mental and physical fitness to carry out their

work responsibilities. The job applicant is asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role

- Verify the person's right to work in the UK, including EU nationals
- If the role is teaching work in relation to children, reasonable steps are taken to establish whether that person is subject to a prohibition order issued by the Secretary of State using the Teaching Regulation Agency (TRA).

9. Teaching Learners about Safeguarding

LSDN will teach learners about safeguarding, including online risks, through teaching and learning opportunities as part of providing a broad and balanced curriculum.

10. Dissemination and Review

The DSL will ensure this policy is known and used appropriately:

- The policy will be reviewed every year.
- The procedures and implementation will be updated and reviewed regularly.
- The policy will be available publicly and students will be made aware of the fact that referrals about suspected abuse or neglect may be made and the role of LSDN.
- Link with the Croydon's Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Should learners leave LSDN, if appropriate, their Safeguarding file will be copied for any new college or training provider as soon as possible but transferred separately from the main learner file.

11. Links to other policies

This policy has links to the following policies and procedures:

- Staff Disciplinary Policy and Procedures
- Anti-Bullying Policy
- Equality & Diversity Policy
- Whistle Blowing
- Prevent Risk Assessment and Action Plan
- Safeguarding Handbook
- Prevent Handbook
- Prevent Guidance
- Staff Code of Conduct
- Anti-Radicalisation Policy
- Risk Assessment and Admissions Policy
- Screening of Applicants and Learners who are Ex-Offenders
- Internet and Intranet Use Policy
- E-Safety Policy
- Safer Recruitment Policy

12. Monitoring Compliance

12.1. Process for monitoring compliance and effectiveness of dealing with disclosure of abuse and procedure for reporting

concerns

Termly: The senior leadership team will receive a report from the Safeguarding Board on safeguarding incidents and reports. A copy of the recommendation's actions arising from this report will be shared with the Governing Body.

Annually: The DSL and Safeguarding Board will review the safeguarding policy and produce recommended amendments/updates that will be presented to the CEO and Governing Body.

12.2. Process for monitoring compliance and effectiveness of dealing with allegations against a member of staff

Where an allegation has been made against a member of staff, the DSL and safeguarding board including the CEO and Director of Human Resources, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the procedures and/or policies. Consideration should also be given to the training needs of staff.

13. Appendices

Appendix 1 – Safeguarding Statement

Appendix 2 – Designated Safeguarding Team

Appendix 3 – Incident Report Form and Action Plan

Appendix 4 – Safeguarding Flowchart – dealing with concerns, suspicions or disclosures of harm or abuse

Appendix 5 – Protocol for Reporting Missing Learners

Appendix 6 – Safeguarding Away from the LSDN Premises

Appendix 7 – Safeguarding Guidelines for Work Placements

Appendix 8 – Safeguarding Declaration

Appendix 9A – E-Safety Policy and Procedure

Appendix 9B – E-Safety Guidelines for All

Appendix 9C – Guidelines for Students (Social Media)

Appendix 9D – Guidelines for Staff (Social Media)

Appendix 9E – Guidelines for students using webinar / video conferencing software

Appendix 9F – Guidelines for staff using webinar / video conferencing software

Appendix 10 – E-Safety Referral Flow Chart

Appendix 11 – Additional forms of abuse

Appendix 12 – Additional Expert and Professional Guidance

Appendix 13 – Channel Referral Process

Appendix 14 – Low-Level Concerns

Appendix 1 – Safeguarding Statement

SAFEGUARDING STATEMENT

London Skills & Development Network is committed to protecting young people and adults at risk from harm. LSDN is an equal opportunities employer. We are committed to safeguarding and promoting the welfare and wellbeing of our students, staff and members of the public.

As a Safe Organisation:

We ensure that all our employees are aware of their responsibilities to safeguard children and adults at risk.

We do this by:

- Adopting safer recruitment (frequent DBS Check) practices to staff to work with young people and adults at risk
- Clear expectations of staff about personal conduct and responsibility to promote the wellbeing of young people and adults at risk at all times
- Good induction systems and ongoing training/updates for staff on safeguarding young people and adults at risk
- Ensuring all staff have access to information and guidance on procedures for child protection of adults at risk
- A team of named managers trained to provide access to specialist advice on child protection and protection of adults at risk
- Sound data protection, information sharing and referral procedures
- The promotion of a culture of safeguarding throughout the company
- Listening to the concerns of young people and vulnerable adults with an open mind
- Clear procedures for investigating allegations of harm to young people or adults at risk by persons in positions of trust within the company, including independent advice and referral to the police as necessary
- Regular reporting of safeguarding incidents to the Senior Management Team
- A clear and accessible complaints procedure where there are concerns to be raised.

Appendix 2 – Designated Safeguarding Team (August 2024)

DESIGNATED SAFEGUARDING TEAM

Designated Safeguarding Leads (DSL):

Emma Rollinson 020 3784 1294

Deputy Designated Safeguarding Officers:

Anna Ulewicz 07553 226 635

Anerie Huisamen 020 3784 1294

Independent Adviser Scrutiny and Challenge:

Dr Daniel Logan Grant – Leaders in Safeguarding
07843 049 271

Prevent LA Contact

Haydar Muntadhar – Croydon Council

0208 726 6000

07562 438 898

Appendix 3 – General Incident Reporting Form and Action Plan

General Incident Reporting Form and Action Plan

This form should be used to record incidents, including safeguarding concerns and incidents. In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the Designated Safeguarding Officer within one working day or the next working day if it's a weekend. The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

ABOUT YOU	
Your name:	Name of organisation:
Your role:	
Contact information (you):	
Address:	Postcode:
Telephone numbers:	Email address:
ABOUT THE INCIDENT	
Student/staff member's name:	Student/staff member's date of birth:
Student/staff member's ethnic origin: <i>Please state below</i>	Does student/staff member have a known disability: <i>Please state below</i>
Student/staff member's gender: ☐ Male ☐ Female	
Are you reporting your own concerns or responding to concerns raised by someone else: ☐ Reporting my own concerns ☐ Responding to concerns raised by someone else	
If responding to concerns raised by someone else, please provide further information below:	
Name:	
Position/status within organisation:	
Telephone numbers:	Email address:
Date and times of incident:	
Details of the incident or concerns: <i>Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.</i>	
Student/staff member's own account of the incident:	

--

Please provide any witness accounts of the incident:
--

Please provide details of any witnesses to the incident: <i>Name:</i> <i>Position/status within organisation:</i> <i>Address:</i> <i>Telephone number:</i> <i>Postcode:</i> <i>Email address:</i>

Please provide details of any person involved in this incident or alleged to have caused the incident: <i>Name:</i> <i>Position/status within organisation:</i> <i>Address:</i> <i>Telephone number:</i> <i>Postcode:</i> <i>Email address:</i>

Please provide details of action(s) taken to date:
--

Has the incident been reported to any external agencies? ☐ Yes ☐ No

If YES please provide further details: <i>Name of organisation / agency:</i> <i>Contact person:</i> <i>Telephone numbers:</i> <i>Email address:</i> <i>Agreed action or advice given:</i>
--

Your Signature:		Print name:	
Date:			

Please submit to LSDN's Designated Safeguarding Officer in line with reporting procedures:

- Emma Rollinson - Designated Safeguarding Leads (DSL) or Anna Ulewicz (Safeguarding Deputy) in the absence of the DSLs
- For incidents related to Health & Safety, please submit this form to David Ramond with a copy to Anerie Huisamen.

Safeguarding Incident Action Plan

RECORD OF INTERVIEW/DISCUSSIONS WITH STAFF(s)/STUDENT(s) INVOLVED IN INCIDENT
RECORD OF INTERVIEW/DISCUSSIONS WITH WITNESSES AND/OR PARTICIPANTS INVOLVED IN INCIDENT
ACTIONS AND RECOMMENDATIONS
NEXT STEPS
FOLLOW-UP NOTES/COMMENTS / PROGRESS REPORT

--

Your Signature:		Print name:	
Date:			

Incident Sign-off

Name:		Position:	
Signature:		Date:	

Appendix 4 – Safeguarding Flowchart – dealing with concerns, suspicions or disclosures of harm or abuse

Step One

You are concerned that a child, young person or adult at risk has been abused because:

- You have seen something
- They have said they have been abused
- Somebody has told you they are concerned
- There has been an allegation against a member of staff
- There has been an anonymous allegation
- An adult has disclosed they are abusing a child or adult at risk

Step Two

Talk to the Designated Safeguarding Lead and record your concern on the incident recording form. If the concern is about the Designated Safeguarding Lead or Deputy CEO/HR Director refer to the CEO or Deputy CEO/HR. (Sign/date/time, include name and job role)

Step Three

- The Designated Safeguarding Lead, will contact Croydon's Children's or Adult's Services and/ or the local police if a crime has (or may have) been committed (101) or if it is an emergency (999).
- S/he should say "I want to make a child/adult protection referral" and (if ringing social care services) ask to speak to a duty social worker. (They may be required to complete an online referral form to report this, which should be submitted on the same day).
- S/he should record, on the incident form, who was spoken to, if a referral was accepted or not (with reasons), along with any actions agreed (sign/date/time, include name and job role) and stored securely in the designated locked filing cabinet.

Notes

In cases of a concern about a member of staff or a learner, you should talk to the Designated Safeguarding Lead

The LADO (Local Authority Designated Officer) or Adults Services will co-ordinate the next steps for any staff or learner in regulated activity. Anyone can whistle-blow' directly to the police, social services or Ofsted if they feel their concerns will not be managed appropriately by the organisation.

All media enquiries should be referred to the CEO.

EVERYONE should observe confidentiality regarding all aspects of safeguarding **including between colleagues, family and friends.**

Appendix 5 – Protocol for Reporting Missing Learners

Rationale:

This protocol is designed to provide an effective response in the event of a learner going missing.

This is an essential part of our responsibility to:

- Safeguard learners
- Ensure that there are no barriers to punctuality and attendance

Definition of Missing:

"Anyone whose whereabouts is unknown whatever the circumstances of disappearances they will be considered missing until located and their well-being established" Ref: The association of chief police officers (ACPO).

When discovering a missing learner: Inform your line manager.

Line manager should:

- Find learner contact details and contact directly if possible – locate learner and arrange safe return to the centre or home. To liaise with the DSL to identify any possible safeguarding concerns and ensure appropriate contact is made.

If no contact is made, the manager should:

- Ascertain when the learner was last seen (keep a note of any witness statements including names and course details)
- Ascertain what course the learner is on and the timetable for that day
- Establish if anyone knows where the learner intended to go
- Searches, where appropriate, of relevant areas
- Contact the parent/carers as appropriate (there should not be a long gap – parents/carers do not want to hear that their son/daughter has been missing for several hours) and give the facts:
 - When the learner was last seen
 - How we discovered he/she was missing
 - What we have done to date

If there is cause for concern and in consultation with the parent/carers (where appropriate):

- Report to police or relevant authority (collect and record incident number)
- Ask the parent/carers to stay in touch if they hear anything
- Maintain contact with parent/carers until the learner is found (parents/carers need to know that we are doing everything in our power to find the learner)
- Report incident to CEO

Investigation/Report records

Identify why a learner has gone missing can be a key part of reducing the likelihood of it happening again and safeguarding that learner. The learner needs to be spoken to about their actions and rationale and any risks they were exposed to. This conversation may reveal the need for ongoing additional support.

When the situation has been resolved, the DSL should:

- Carry out a full investigation
- Establish why the situation occurred
- Work with the course tutor and parent/carer/learner support team if appropriate to establish a safe system of supervision in the future
- Provide a written report for the learner file (be aware of confidentiality and data protection)
- Ensure that a letter is written to the parent/carer, to confirm any new arrangements, including responsibilities to be assumed by external Parties

Information Sharing

If there is a concern about a learner's safety or wellbeing it may be necessary to share information with other agencies. Their safety and wellbeing of the child must be the primary considerations when making such a decision.

Sharing of information must be in line with confidentiality, data protection and human rights legislation and guidance. Information shared will need to be carefully recorded. In most circumstances consent from a parent/carer/learner would need to be gained to share information; however there are some circumstances in which sharing information without consent will be normally justified. These are:

- When there is evidence or reasonable cause to believe that a child is suffering, or is at risk of suffering sufficient harm; or
- When there is evidence or reasonable cause to believe that an adult is suffering, or is at risk of suffering; or
- To prevent, detect or to support the prosecution of serious crime

The Police Response

Where a missing person report is made, the police have an obligation to take action, within their powers, to safeguard the rights of individuals who may be at risk. Those under 18 will not be considered 'low risk'. Where a missing person has been identified as high or medium risk, positive action becomes an obligation at every stage of the missing person investigation.

Useful Contacts:

If you believe a learner is at immediate risk this should be reported without delay to the police service; for emergencies call 999.

Appendix 6 – Safeguarding Away from LSDN Premises

Introduction

Any learner under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidance (Working Together to Safeguard Children 2018).

Incidents of child abuse are not common, but any child aged between the ages of 0 to 18 must be considered as vulnerable to abuse whether this is in the home, in school or college, in the workplace or in some other place.

Child abuse can take many forms, but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that children and young people are protected from any form of harm.

Guidance

Schools, colleges and training providers organising work placements and other activities must ensure that policies and procedures are in place to protect children and young people from harm, focusing greatest emphasis on settings in which children may be most at risk, for example where children will be placed for long periods in one to one situations with an adult.

These can be considered where the placement is as follows:

- For more than one day a week
- For longer than one term per academic year
- Aimed at those children who may be vulnerable e.g. those who are aged under 16 or have special needs
- Where the workplace supervisor or colleague will have substantial unsupervised access to the child, because of the nature of the business
- Long-term extended work placements must include arrangements for DBS Disclosures for example when Young Apprentices are in a placement
- Trips are part of the work placement
- Any offsite delivery, including observations in the workplace

It is essential that the key supervisor of the learner, if not under the direct responsibility of a member of LSDN staff, is aware of their responsibilities with respect to child protection.

Appendix 7 – Safeguarding Guidelines for Work Placements

Schools, colleges and training providers organising work placements must ensure that policies and procedures are in place to protect children and young people from harm.

It is essential that the key supervisor of the learner is aware of the procedures in place to ensure the safety of the young person.

Introduction

Any young person under the age of 18 is considered, in the eyes of the law, as a child and is protected by the child protection laws and guidelines (Working Together to Safeguard Children 2018).

Incidents of child abuse are not common but any child aged between the ages of 0 and 18 must be considered as vulnerable to abuse whether this is in the home, in school or college, in the workplace or in some other place.

Child abuse can take many forms but it is categorised under 4 themes:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

It is important that young people are protected from harm.

Traineeship learners / Work Experience Students

- Work placement providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding.
- A senior manager, Programme Lead or appropriately trained member of staff will carry out all workplace risk assessments and will include safeguarding discussion as part of workplace reviews with students.
- Work placement learners will receive information relating to safeguarding and safe working practices in the workplace and safeguarding contact details.
- When dealing with a disclosure, the referral procedures set out in section 7 will be followed.
- All employers providing work placements to LSDN students will complete and return the LSDN work placement paperwork (adapted from the DfE guidance), including, due diligence sections and the Safeguarding Declaration.

Appendix 8 – Safeguarding Declaration (employers)

SAFEGUARDING DECLARATION

(To be completed and returned to LSDN – Copy to be retained by supervisor)

Name of Organisation:	
Address of Organisation:	
Telephone Number:	
I confirm that I have read and understood the guidelines and procedures contained within the attached document. I also understand my responsibilities as the Placement Supervisor.	
Placement Supervisor Name (print):	
Placement Supervisor Signature:	
I confirm that I have explained LSDN's Safeguarding Policy to the above-named supervisor and that they are aware of the procedures to follow if they are concerned about the welfare of a young person.	
LSDN Representative (print name):	
LSDN Representative Signature:	
Date:	

Appendix 9A – E-Safety Policy and Procedure

Introduction

LSDN recognises the benefits and opportunities which new technologies offer to teaching and learning. We provide internet access to all students and staff and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning. However, the accessibility and global nature of the internet and different technologies mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement appropriate safeguards within the organisation while supporting staff and students to identify and manage risks independently and with confidence. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our policies. As part of our duty to safeguard students, we will do all that we can to make our students and staff stay safe online and to satisfy our wider duty of care.

Scope:

The policy applies to all students and staff and all members of the LSDN community who have access to LSDN's IT systems, both on the premises and remotely. Any user of LSDN's IT systems must adhere to and accept the Internet and Intranet Use Policy. The e-Safety Policy applies to all use of the internet and forms of electronic communication such as email, mobile phones, social media, instant messaging, webinar and video conferencing etc.

Definition:

The term e-safety is defined for the purposes of this document as the process of limiting the risks to children, young people and vulnerable adults when using Internet, Digital and Mobile Technologies (IDMTs) through a combined approach to policies and procedures, infrastructures and education, including training, underpinned by standards and inspection.

E-safety risks can be summarised under the following three headings:

Content

- Exposure to age-inappropriate material
- Exposure to inaccurate or misleading information
- Exposure to socially unacceptable material, such as that inciting violence, hate or intolerance, sites promoting radicalisation or pornography
- Exposure to illegal material, such as images of child abuse
- Illegal downloading of copyrighted materials e.g. music and films

Contact

- Grooming using communication technologies, potentially leading to sexual assault, child sexual exploitation and radicalisation
- The use of assumed identities on gaming platforms
- Bullying via websites, mobile phones or other forms of

- communication device
- Spyware, e.g. use of Remote Access Trojans/Tools to access private information or spy on their victim.

Commerce

- Exposure of minors to inappropriate commercial advertising
- Exposure to online gambling services
- Commercial and financial scams

Responsibilities

The Quality Lead and Compliance Manager are responsible for maintaining this policy.

The following are responsible for implementing it:

- The Safeguarding Lead is responsible for keeping up to date with new technologies and their use, as well as attending relevant training. They will deliver staff development and training, record incidents, report any developments and incidents and liaise with the local authority and external agencies to promote e-safety within the College community.
- The Safeguarding Lead will also provide pastoral and practical support for students dealing with issues related to e-safety.
- The Student Development Manager for incorporating e-safety into student induction.
- The teaching staff and personal tutors for incorporating e-safety as part of the learning programmes, tutorials, and learner reviews.
- All teaching staff for embedding e-safety education and practice into their teaching programme.
- All Managers for implementing good e-safety practice and safeguards consistent with this policy in their area of responsibility.
- All members of LSDN staff for staying alert to and responding appropriately to any potential or actual e-safety issue.

Security

LSDN will do all that it can to make sure the network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of firewalls, servers, routers, workstations to prevent accidental or malicious access of LSDN's systems and information. Digital communications, including email and internet postings, over the network, will be monitored in line with the Internet and Intranet Use Policy.

LSDN complies with guidelines set out by the Counter Terrorism Internet Referral Unit (CTIRU) and has a statutory duty to ensure their systems cannot be used to access any of the websites on the CTIRU list.

Behaviour

LSDN will ensure that all users of technologies adhere to the standard of behaviour as set out in the Internet and Intranet Use Policy.

LSDN will not tolerate any abuse of IT systems. Whether offline or online, communications by staff and students should be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the student and staff disciplinary procedures.

Use of Images and Video

The use of images, or photographs, is popular in teaching and learning and should be encouraged where there is no breach of copyright or other rights of another person (e.g. images' rights or rights associated with personal data). This will include images downloaded from the internet and those belonging to staff or students.

All students and staff should receive training on the risks when taking, downloading and posting images online and making them available to others. There are particular risks where personal images of themselves or others are posted onto social networking sites, for example.

LSDN teaching staff will provide information to students on the appropriate use of images as detailed in the Internet and Intranet Use Policy. This includes photographs of students and staff as well as using third party images. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

No image/photograph can be copied, downloaded, shared or distributed online without permission from the owner. Photographs of activities on the LSDN premises should be considered carefully and have the consent of the Marketing department before being published. Approved photographs should not include names of individuals without consent.

Education and Training

With the current unlimited nature of internet access, it is impossible for LSDN to eliminate all risks for staff and students. It is our view therefore, that LSDN should support staff and students to stay e-safe through regular training and education. This will provide individuals with skills to be able to identify risks independently and manage them effectively.

For students:

Students have access to e-safety e-learning modules and assessments and 16-18 full time students will attend e-safety tutorial sessions. An area on Google Classrooms has also been set up with e- safety resources which are signposted at induction. Students should also know what to do and who to talk to where they have concerns about inappropriate content, either where that material is directed to them, or where it is discovered as part of a random search.

Within classes, students will be encouraged to question the validity and reliability of materials researched, viewed or downloaded. They will also be encouraged to respect the copyright of other parties and to cite references

properly. Appendix A shows E-Safety Guidelines, Appendix B shows Guidelines for Students (Social Media) and Appendix D shows Guidelines for students using webinar / video conferencing software.

For staff:

Staff will take part in mandatory Safeguarding training (which includes e-safety) with updates every 3 years. Further resources of useful guidance and information will be issued to all staff following the session. Staff attendance is recorded and monitored by HR.

Staff will also be asked to sign the Internet and Intranet Use Policy. Appendix A shows E- Safety Guidelines, Appendix C shows Guidelines for Staff (Social Media) and Appendix E shows Guidelines for staff using webinar / video conferencing software.

Incidents and Response

Where an e-safety incident is reported to LSDN this matter will be dealt with very seriously. LSDN will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a student wishes to report an incident, they can do so to their tutor, Duty Manager or to the Safeguarding Lead. Where a member of staff wishes to report an incident, they must contact their line manager as soon as possible. Following any incident, LSDN will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place, external agencies may be involved or the matter may be resolved internally depending on the seriousness of the incident. Serious incidents will be dealt with by senior management, in consultation with appropriate external agencies.

Appendix 9B - E-Safety Guidelines for All

- Keep your personal information private – avoid sharing personal information such as your phone number, home address or photographs with people you don't know in person and trust.
- Check whether the social media networks you use allow you to create friend lists. These lists let you manage who sees what. For example, you may only want your closest friends to see some information.
- Use private messages for people whom you know in person and trust; be careful of private messaging people you don't know.
- Use a strong and unique password for all of your online accounts – a combination of letters, numbers and symbols (and if you've ever shared it in the past, CHANGE IT).
- Know how to block someone if they make you feel uncomfortable or upset.
- Learn how to save chat logs and texts so that if someone does make you uncomfortable or upset, you have evidence to report them.
- Remember to log out of a site properly after use, especially on a shared computer.
- Keep your clothes on when using webcam – images of you could end up in the wrong hands!
- Think very carefully about meeting someone face to face who you only know online – NEVER do this alone, always talk to your parents or carers, trusted friends or loved ones before you go ahead with this and take a trusted adult friend along with you.

Appendix 9C – Guidelines for Students (Social Media)

As part of our duty of care to our students, LSDN sets out guidelines, for students when using social media. These guidelines are included in the student handbook and the purpose of including them here is to make staff aware of the guidelines and to encourage staff to discuss them with students.

Students should follow the guidelines below at all times:

- Do not enter into a “friends” relationship online with someone you do not know.
- Do not use social media to harass, threaten, insult, defame or bully another person or entity; to violate any LSDN policy; or to engage in any unlawful act, including but not limited to gambling, identity theft or other types of fraud.
- Do not access or participate in social media which incites hatred or promotes radicalisation.
- Set up privacy settings carefully, ensure you are not sharing any information that you do not want to and check these on a regular basis.
- Participating in social media use as part of course activity is optional. Students may opt out at any time.
- Discussions on LSDN branded social media should be appropriate and LSDN or course related.
- When posting on sites linked to LSDN or when mentioning or referring to LSDN on social media do not:
 - Use foul or abusive language
 - Harass, threaten, insult, defame, blackmail or bully another person
 - Refer to any other member of the LSDN community, whether student or staff, in a derogatory or insulting manner
 - Do not breach confidentiality, share personal details of any LSDN student or staff member, or name any LSDN student/staff without their explicit permission.
 - Refer to LSDN, its courses or facilities or any other aspect of its offering, in a derogatory or insulting manner
 - Post or comment in any way that reflects poorly on LSDN or is deemed to interfere with the conduct of LSDN business
- Posting of messages that are deemed inappropriate will be dealt with under the student disciplinary procedure.
- Copies of inappropriate posts may be reported to the appropriate

authorities. Before you post a message, think carefully about its content and ask yourself how you would feel if you received that message or know that it may be disclosed in court

- Any form of abuse or cyber-bullying will be dealt with under the student disciplinary procedure and applicable UK laws.

Appendix 9D – Guidelines for Staff (Social Media)

This policy sets out guidelines for staff, below, for the use of social media. These guidelines apply to:

- Posting to any LSDN social media site;
- Communicating with members of the LSDN community including staff or students;
- Discussing LSDN on any site(whether at work and using the LSDN network and equipment or through a personal account or using a personal phone, computer or other device from any other location).

Staff should follow the guidelines below at all times:

- Be professional. As a LSDN employee you are an ambassador for the organisation. Protect the LSDN brand and values at all times, do not make derogatory comments about LSDN products, services, management, employees or systems.
- Never have a “friend” relationship with a student online, where personal details are shared.
- If the Social Media requires a login, create a separate “work” login and ensure any privacy settings are set appropriately so that no personal information can be viewed.
- Staff should not share any personal information online including home address, personal telephone numbers, personal email addresses or date of birth.
- Discussions on social media sites linked to LSDN should be appropriate and be work or course-related
- When communicating with students who are under 18 via email, where possible, LSDN student email addresses should be used.
- Email communications with students under 18 must happen within normal working hours (8.30 – 5pm).
- Staff should not comment on anything related to legal matters, litigation, or any parties LSDN may be in dispute with or anything that may be considered a crisis situation.
- Do not access or participate in social media which incites hatred or promotes radicalisation.
- Do not upload to video/photo sharing sites (e.g. YouTube) unless it is done via the LSDN official channel.
- Do not post a person’s photograph or video image without first obtaining permission and signed release forms from anyone depicted in the photograph or video (any photographs of children and young people under the age of 16 should have parental permission). Blank release forms may be requested from the Compliance Manager and should be promptly returned after they are signed.

- Protect confidential and sensitive information at all times.
- Remember that statutory regulations and LSDN policies including inappropriate conduct such as sexual (or other) harassment, bullying, discrimination, defamation, infringement of copyright and trademark rights, data protection and unauthorised disclosure of student records and other confidential and private information, will apply to communications by LSDN students and staff through social media and you may face prosecution for breaches of any applicable legislation.
- When posting on sites linked to LSDN or when mentioning or referring to LSDN on social media do not:
 - Use foul or abusive language
 - Harass, threaten, insult, defame or bully another person
 - Do not breach confidentiality, share personal details of any LSDN student or staff member, or name any LSDN student/staff member without their explicit permission.
 - Refer to any other member of the LSDN community, whether student or staff, in a derogatory or insulting manner
 - Refer to LSDN, its courses or facilities or any other aspect of its offering, in a derogatory or insulting manner
 - Post or comment in any way that reflects poorly on LSDN or is deemed to interfere with the conduct of LSDN business
- Staff should not spend an excessive amount of time while at work using social media websites in a personal capacity. They should ensure that use of social media does not interfere with their other duties as this is likely to have a detrimental effect on productivity
- Any breach in this Policy could result in an investigation and disciplinary procedures under the staff disciplinary policy. Serious breaches of this policy, for example incidents of bullying of colleagues or social media activity causing reputational damage to LSDN, may constitute gross misconduct and lead to dismissal, and/or reported to authorities

Appendix 9E – Guidelines for students using webinar / video conferencing software

This policy sets out guidelines for students using webinar/video conferencing software:

Do:

- Conduct yourself in a professional manner throughout calls with tutors, support staff or other students.
- Attend video calls from a desk or other appropriate location. If you do work from your bedroom, you should blur your background.
- Make sure you are dressed appropriately
- Be punctual and courteous. Language must be professional and appropriate. Turn your phone to silent. Treat this just like you would a lesson or meeting at LSDN.
- Look at your screen, pay attention to others and when speaking make sure to look at your camera.
- Use the 'blur background option' to hide any background if needed.
- Check what you can see when you first log in as this is what others will see.
- Mute your microphone when not needing to talk to avoid any background noise.
- Position yourself away from where your family members or pets are.
- Only post chat messages relevant to the lessons

Don't:

- Conduct/attend a video call if it would be improper for a face-to-face meeting.
- Shout; the other participants will tell you if they cannot hear you.
- Click your pen, tap on your desk or anything else which can cause distraction to others.
- Smoke or vape.
- Avoid having multiple applications open during the call as it may affect the quality.

Appendix 9F – Guidelines for staff using webinar / video conferencing software

This policy sets out guidelines for staff using webinar/video conferencing software:

Do:

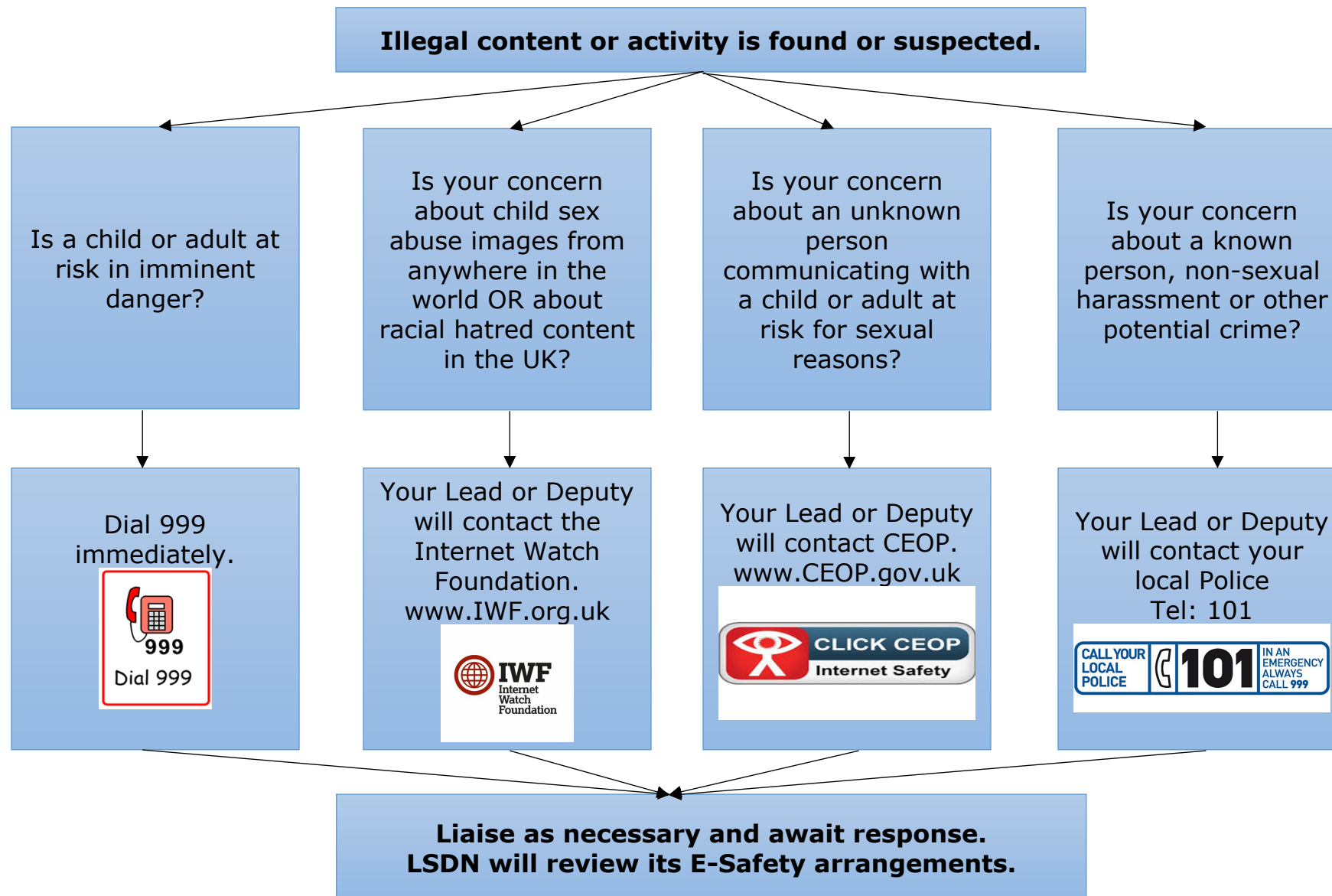
- All 1:1 online activity with under 18s or vulnerable adults **MUST** be agreed with students prior to the 1:1 taking place. The 1:1 must then take place only at the days / times agreed.
- **If at any time you feel uncomfortable during a 1:1 call, with something done or said, you should end the call as soon as possible and report any concerns to your line manager and / or safeguarding.** Examples may include: student inappropriately dressed or in an inappropriate location (eg bedroom).
- Please note: If your safeguarding training is not up to date you **MUST NOT** conduct a 1:1 video conferencing session. Refer to your line manager for further guidance.
- Where possible set up online meetings/lessons with students through Google Meet or Zoom and use the waiting rooms facility. This prevents unwanted guests and avoids 'Zoom Bombing'.
- Encourage students to maintain an awareness of employability skills in how they conduct themselves in online sessions.
- Conduct yourself in a professional manner throughout calls with colleagues or students - you remain an employee of LSDN throughout the call.
- Conduct video calls to students or colleagues from a desk or other appropriate location. If you have no other option and you are required to work from your bedroom, you **MUST** blur your background.
- Remind students that all calls/videos may be recorded - this is to safeguard both parties and wouldn't routinely be shared.
- Be punctual and courteous. Language must be professional and appropriate. Introduce yourself and take note of other attendees' so you can address them by name. Turn your phone to silent. Treat this just like you would a face-to-face meeting with a student, colleague or other adult.
- Test your audio and/or video before a scheduled call.
- Look at your screen, pay attention to others and when speaking make sure to look at your camera.

- Use the 'blur background option' to hide any background if needed.
- Check what you can see when you first log in as this is what others will see.
- Mute your microphone when not needing to talk to avoid any background noise.
- Position yourself away from pets and other people in your household.

Don't:

- Conduct a video call if it would be improper for a face-to-face meeting.
- Multi-task; your audience will be aware.
- Shout; the other participants will tell you if they cannot hear.
- Click your pen, tap on your desk or anything else annoying or distracting.
- Smoke or vape
- Eat or drink, other than water / tea / coffee
- Leave multiple applications open during the call as it may affect the quality.

Appendix 10 - E-Safety Referral Flow Chart



Appendix 11 – Additional Forms of Abuse

Specific issues and further information: specific advice should also be sought in relation to specific situations including forced marriage, the effects of domestic violence on young people, female genital mutilation, children and young people who sexually abuse or who are exploited and those affected by drug and alcohol abuse in families.

- i. **Abuse of trust:** under the Sexual Offenders Act 2003 it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This includes teaching and a range of support staff within educational establishments.
- ii. **Radicalisation:** The process by which a person comes to support terrorism and forms of extremism leading to terrorism (Prevent Strategy.Gov.uk)
- iii. **Online Abuse:** any type of abuse that happens on the web, whether through social networks, playing games online or using mobile Phones. Refer to E-safety policy.
- iv. **Child sexual exploitation:** Is a type of abuse where children are sexually exploited for money, power or status. It is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity. This act occurs in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator.
- v. **Female genital mutilation:** FGM is the total or partial removal of the external female genitalia for non-medical reasons.
- vi. **Domestic abuse:** witnessing domestic abuse is child abuse; Teenagers can suffer domestic abuse in their relationships.
- vii. **Child trafficking:** Is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold.
- viii. **Harmful sexual behaviour:** Children or young people develop sexual behaviours that harm themselves or others.
- ix. **Honour based violence:** a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

- x. **Forced marriage:** where people face physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if the person is made to feel like they're bringing shame on the family).
- xi. **Upskirting:** a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).
- xii. **Sexting:** refers to the sending of sexually explicit images via text, email, MSN or through social networking sites.
- xiii. **Child Criminal Exploitation (CCE):** it refers to county lines. Criminal exploitation is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom children and young people to carry drugs and money from urban areas to suburban and rural areas. CCE also involves enticing or grooming young people into crime or gang activity for illicit gains.
- xiv. **Children missing in education:** Children missing in education is often an indicator of other potential safeguarding concerns. Through its attendance reporting process and follow-up procedures, the organisation should have measures to follow up on students who could potentially be 'missing in education'.
- xv. **Child-on-child abuse** (previously peer on peer): All staff should be aware that children can abuse other children and that it can happen both inside and outside of the learning environment and online. Staff should understand that even if there are no reports of child-on-child abuse within the setting, it does not mean that it isn't happening, and they need to be vigilant. It is important that all staff challenge inappropriate behaviours between abusive students. Child-on-child abuse is most likely to include but may not be limited to:
 - bullying (including cyberbullying, prejudice and discriminatory bullying)
 - sexual violence, such as rape, assault by penetration and sexual assault. This may include an online element that facilitates, threatens, or encourages sexual violence
 - sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of behaviours
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - abuse in an intimate relationship

- consensual or non-consensual sharing of nudes and semi-nude images
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party.
- xvi. **Domestic abuse:** Can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.
- xvii. **LGBTQ+:** A child or young person identifying as LGBTQ+ is not in itself an inherent risk factor for harm, children who are LGBTQ+ can be targeted by other children. In some cases a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Appendix 12 – Additional Expert and Professional Guidance

Further expert and professional guidance and practical support on specific safeguarding issues can be accessed via the www.gov.uk website as follows:

- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- LGBTQ+
- Mental health
- Private fostering
- Radicalisation
- Sex-based violence/violence against women and girls (VAWG)
- Sexting
- Teenage relationship abuse
- Trafficking

In addition to the above, information can be found on the NSPCC website www.nspcc.org.uk

Safeguarding Partners Guidance

If we are worried that a child, young person or adult is at risk of abuse, harm or neglect, please call 999 and ask for the police. They will put you in touch with the safeguarding professionals in the area where the incident is said to have taken place.

If a member of the Safeguarding team cannot be contacted (for example out of hours) NSPCC, Childline or Safeguarding partners can provide safeguarding advice and support service.

Croydon Children Social Services – Telephone: 02082552888

Croydon Children Social Services (out of hours) – Telephone: 02087266400

NSPCC 24 hours 7 days per week – Telephone: 0808 800 5000

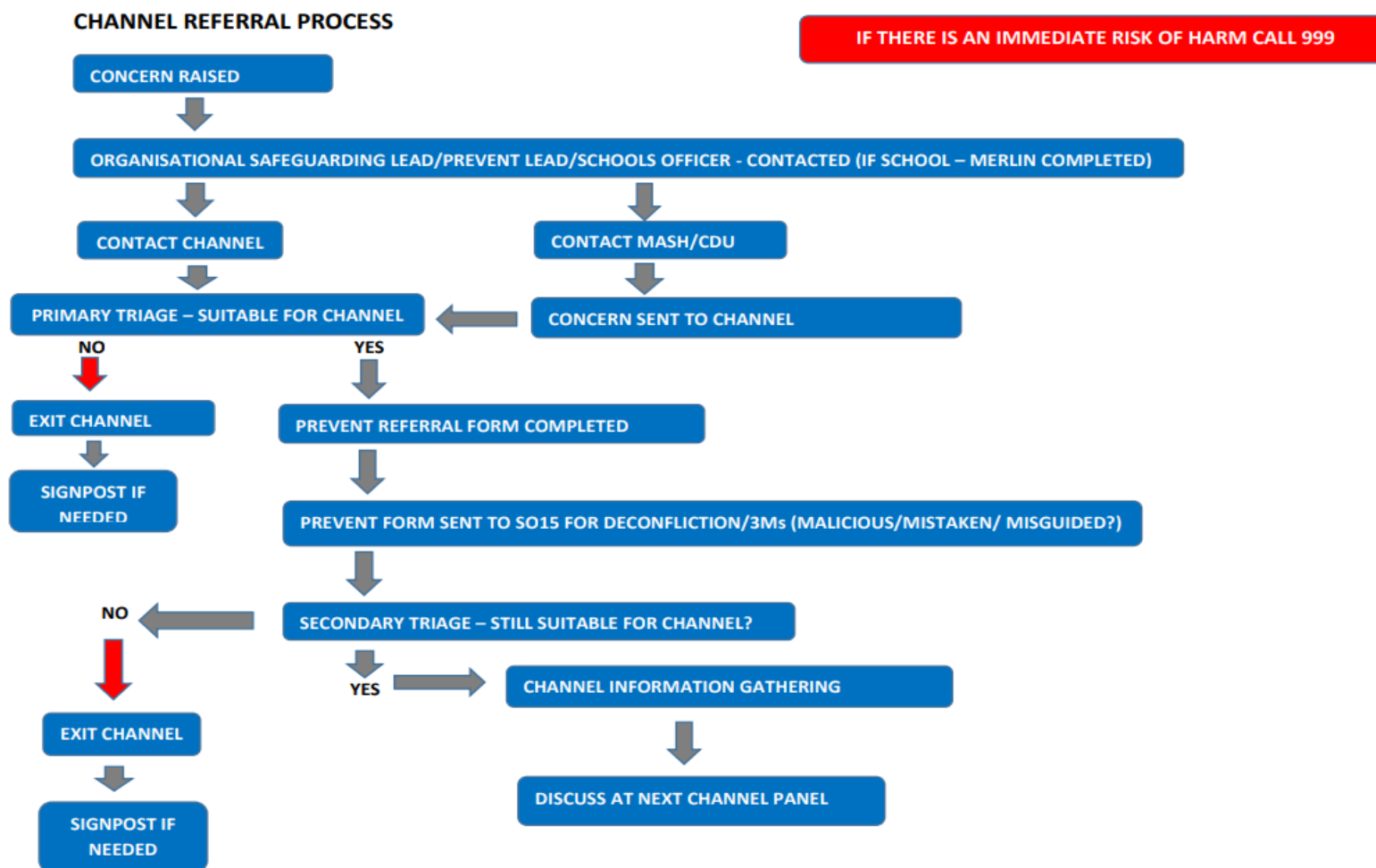


www.nspcc.org.uk

Childline 24 hours 7 days per week – Telephone: 0800 1111

www.childline.org.uk

Appendix 13 – Channel Referral Process



Appendix 14 – Low-Level Concerns

Governing bodies and proprietors should have policies and processes to deal with **any** concerns or allegations which **do not** meet the harm threshold, referred to in this guidance as 'low-level' concerns. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

As part of their LSDN's institution-wide approach to safeguarding, LSDN promotes an open and transparent culture in which **all** concerns about all working in or on behalf of LSDN (including supply teachers, volunteers, individuals and contractors) are dealt with promptly and appropriately.

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

- Enable LSDN to identify inappropriate, problematic or concerning behaviour early
- Minimise the risk of abuse, and
- Ensure that individuals working in or on behalf of LSDN are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

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 individual working in or on behalf of LSDN may have acted in a way that:

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

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

- being over friendly with children/young people/student
- having favourites
- taking photographs of children/young people/student on their mobile phone, contrary to LSDN policy
- engaging with a child/young person/student on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children/young people/students.

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

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

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

Staff code of conduct and safeguarding policies

As good practice, LSDN has set out its low-level concerns policy within its staff code of conduct and safeguarding and child protection policies. LSDN's policies and guidance make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e., to create and embed a culture of openness, trust and transparency in which the school's or college's values and expected behaviour are lived, monitored and reinforced constantly by all staff.

LSDN ensures its staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively and ensure that appropriate action is taken in a timely manner to safeguard children, young people and students, and facilitates a whole institution approach to dealing with **any** concerns.

LSDN aims to achieve the purpose of its low-level concerns policy by:

- ensuring its staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from problematic or concerning behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns (see below)
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- handling and responding to such concerns sensitively and proportionately when they are raised, and
- helping identify any weakness in LSDN's safeguarding system.

Sharing low-level concerns

LSDN has ensured that its low-level concerns policy contains a procedure for sharing confidentiality such concerns which is clear, easy to understand and implement. Low-level concerns are shared initially with the DSL. The DSL should inform the CEO of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The CEO should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the CEO may wish to consult with the DSL and take a more collaborative decision-making approach.

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

If the DLS is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

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

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

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

Records will be retained at least until the individual leaves their employment at LSDN.

References

LSDN will only provide substantiated safeguarding concerns/allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Responding to low-level concerns

LSDN's low-level concerns policy sets out the procedure for responding to reports of low-

level concerns. If the concern has been raised via a third party, the DLS or CEO will collect as much evidence as possible by speaking:

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

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

LSDN's low-level concerns policy is a reflection and extension of its wider staff code of conduct policy.

LSDN Staff Low Level Concern Referral Form:

<https://docs.google.com/forms/d/e/1FAIpQLScEAg0Zd4MWF7PGWe-zsGy2I-LOHKbDkip4UJAnfSDcZkD7jg/viewform>