



Safeguarding Policy

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Introduction

UK College of Business and Computing recognises that it has a statutory duty to report disclosures of allegations of abuse/radicalisation. It also has a moral duty to promote and safeguard the welfare of its students and staff. This includes helping to protect them from situations in which they are abused.

The Policy addresses all aspects of Safeguarding within the work of the College. For the purposes of this Policy, the term “the College” is deemed to include all members of its staff, governors and student body.

Links to QAA Quality Code and National Legislation

This document is designed to underpin the culture of the safeguarding requirements to ensure student and staff welfare at the college. In doing so, it takes reference from the Quality Code **Expectations for standards core practices and Expectations for quality core practices.**

*Higher education providers have in place, monitor and evaluate arrangements and resources which enable students to develop their academic, personal and professional potential. **Guiding Principles 1-7***

*Higher education providers take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience. **Guiding Principles 1-7***

*Higher education providers have procedures for handling academic appeals and student complaints about the quality of learning opportunities; these procedures are fair, accessible and timely, and enable enhancement. **Guiding Principles 1-8***

Additionally, UKCBC complies with relevant parts of the following legislation ensuring all documentation and details remain sensitive:

- The Human Rights Act 1998
- The Common Law of Confidentiality
- The Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Prevent Duty

Links to other policies and documents

The remainder of this policy will relate to the Safeguarding provision, services and opportunities available to students at UKCBC. UKCBC recommends that this policy is understood in the context of the wider maintenance of all elements of safeguarding its members and stakeholder engagement particularly in relation to the following documents:

- Prevent Duty
- Freedom of Speech Policy
- Equality and Diversity Policy
- Complaints Policy
- Information Technology Policy
- Data Protection Policy
- Work Placement Handbook

- Best Practice in Safeguarding in Colleges
(<https://www.gov.uk/government/publications/safeguarding-best-practice-in-colleges>)

Scope and definition of Safeguarding against Abuse and Radicalisation

The College is safeguarding against abuse by:

- Establishing a safe learning environment in which all students can learn and develop.
- Developing and using safe recruitment procedures and to ensure that any College member who has substantial contact with vulnerable adults will be checked for relevant criminal convictions whenever appropriate and possible within the constraints of legislation. An enhanced disclosure (DBS) check will normally be required. A satisfactory check will need to be received by the College before an individual commences work in a post which requires such a check or before a student is involved in activity required (in the opinion of either the College or relevant third parties) such a check. For those who are non-UK nationals or who have lived overseas a check may also be required from that country. Only exceptionally where a DBS check had been requested, but not yet received, might an individual be allowed to start when a satisfactory risk assessment had been conducted.
- Ensuring that all staff applicants are required to complete and sign an application form.
- Seeking references for all staff applicants.
- Helping to equip students and staff with information and awareness to keep themselves safe.
- Maintaining clear procedures to identify and report suspected cases of abuse.
- Ensuring all staff are aware of these procedures and trained in their use as appropriate.
- Ensuring all students involved in work placements are aware of safeguarding procedures and notification channels
- Providing appropriate support to students who have been abused.

Please refer to Appendix 2 for definitions of abuse and neglect.

Safeguarding Against Radicalisation

The College recognises its duty under the Prevent Duty agenda and understands the positive contribution it can make towards protecting its students from radicalisation and/or violent extremism.

The College will publish a Prevent Policy and continue to:

- Empower its students to create communities that are resilient to extremism.
- Protect the wellbeing of particular students' who may be vulnerable into being drawn into violent extremism or crime.
- Promote values of openness and tolerance which is characteristic of British values (British values is defined as "**democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs**").

The Prevent Policy and Freedom of Speech Policy and procedures identify that the allegations, suspicions or concerns of radicalisation will be tackled using the safeguarding policies and embedded in the College. Radicalisation is the process by which individuals come to support terrorism or violent extremism.

The College recognises that it has a duty to report any concerns around the welfare and wellbeing of its students including concerns around Female Genital Mutilation (FGM). These concerns will be reported using the Safeguarding Policy and Procedures.

Roles and Responsibilities

The College has a dedicated Safeguarding Officer who will be responsible for:

- Raising awareness about Safeguarding;
- Implementing and promoting this Policy;
- Updating the Policy annually along with the Prevent Policy;
- Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of students;
- Acting as the main contact within the College for the protection of its members;
- Ensuring that appropriate College members are provided with information, advice and training on the protection of adults in a vulnerable situation;
- Ensuring that information is secured, used and maintained in line with internal and external standards including ensuring that confidential information is processed in line with the Data Protection Act and UKCBC policies
- Establishing and maintaining contacts with our partners which include the Police, Children's Safeguarding Board, Social Services and Prevent Coordinators;
- Maintaining confidential records of relevant cases and action taken.
- Ensuring that all members of staff are clear of their own roles and responsibilities when reporting any suspected case of abuse. All cases must be referred to the Safeguarding Officer.
- Ascertaining that the College provides Safeguarding Training to key personnel to ensure that they have the necessary awareness to safeguard students in their care. The Safeguarding Officer is trained to Level 3.
- Students are made aware of who the Safeguarding Officer is and how they will be supported and what the Safeguarding Officer's (SO's) responsibilities are within the College, through the College Induction programme delivered on entry to the College.
- Making timely external referrals (if any) to outside agencies in order to appropriately safeguard the students and staff;

In case of absence of the designated safeguarding officer, the Campus Managers on duty are the nominated safeguarding officers and will absorb her responsibilities. Concerns can be communicated via email safeguarding@ukcbc.ac.uk and telephone 0208 518 4994.

Premises

No child (deemed 16 years of age or below) or young person (16 to 18 years of age) are allowed at any campus unless the visit has been sanctioned by the Campus Manager at the relevant campus. If sanctioned by the appropriate Campus Manager, the following rules will apply:

- Parents are to sign in their child/ren at the campus reception area at the start and end of the visit
- Parents are solely responsible for their child/ren whilst on the premises
- Parents must not leave their child/ren alone at any time
- Restricted rights of way on campus rules will apply
- Parents must make an appointment with the relevant member of staff they are visiting and wait in the reception area to be seen
- Children must not be allowed free access to any areas at the campuses
- Any member of staff observing unaccompanied children must report it to the main reception immediately

Safeguarding procedure for Staff

If a student discloses information to a member of staff that abuse is taking place, they should be acknowledged, taken seriously and listened to.

- As soon as it becomes clear that the student is talking about a situation of abuse, they should be gently stopped and informed that if they continue, the staff member has a legal obligation to pass information on to the Safeguarding Officer using the Safeguarding Form (Appendix 1). **Staff cannot and must not promise confidentiality to a student.**
- It is important not to ask too many questions; **staff must not under any circumstances investigate any accusations.** As soon as it is possible, staff should write down the factual details of what has been said using a pink Safeguarding Form available from the Reception areas at all Campuses. There should be only one copy of this form (it cannot be photocopied) then given as soon as possible to the SO. No other paper or electronic copies should be kept.
- Staff must contact the SO as soon as possible, but certainly the same day, to explain the situation and pass on the written notes. The SO will outline the action that needs to be taken so that this can be explained to the student. It may be appropriate for the SO to meet the student.
- **Staff must not take any further action themselves or disclose any information to anyone else.** This includes contacting outside agencies.
- As far as possible, the wishes and views of the student will be considered.
- If a member of staff has suspicions that a student is suffering abuse they must discuss these concerns with the SO where possible and not take any independent action.
- All contact with outside agencies regarding safeguarding issues of abuse must be conducted by the SO.
- If the student suffering abuse is over 18 but we are aware that there may be **siblings or children under 18 who may be at risk**, the SO must be informed.
- The College will liaise with the Police and support them with enquiries in relation to the safeguarding and well-being of the students.
- Please refer to Appendix 5 for the conduct of professional relationships between staff and students.
- Please refer to Appendix 4 for Reporting e-Safety incidents workflow.

Allegations of a student abusing another student

If a student has been accused of being involved as an abuser within an abuse allegation, the SO must be contacted as soon as possible. The SO will contact the Police immediately as this is a criminal act and a view needs to be taken as to if a prosecution will take place. In this instance, both parties' next of kin is informed and it is likely that the accused student will be suspended immediately. If they are not suspended, a risk assessment will need to take place immediately so that a judgement can be made as to

that individual's range of activity within the College, prior to the outcome of any investigation being known.

Allegations of abuse against a member of staff

Any allegations of abuse made against a member of the College staff should be dealt with under the guidelines contained in Appendix 3. In relation to the student, all previously outlined procedures will be followed, with the student being referred to the SO.

Bullying and Harassment

- The College is committed to ensuring that students are entitled to receive education and training free from threat, oppression, or abuse. The student disciplinary process reinforces the view that bullying and harassment are unacceptable and inconsistent with College objectives.
- All staff will set a good example to students and promote mutual co-operation and respect within the College community and make plain the College's attitude towards bullying and harassment.
- The College will provide specialist advice and guidance on bullying and harassment during the college Induction period and through its tutorial provision.
- Any incidents of bullying will be reported to the relevant Campus Manager who may seek advice from the SO. Staff will act, without delay and positively; when bullying or harassment of any kind are reported or observed. The College's student disciplinary procedure will be instigated as appropriate.

Disclosure and Barring Service (DBS)

It is expected that students who apply to enrol on specific courses give their consent to apply for an Enhanced Disclosure and Barring Service (DBS) check. Failure to give permission will result in exclusion of the said course. In some cases, other courses may be offered as an alternative. Students on specific courses must obtain a successful DBS certificate within 4 weeks of starting the programme. This must be maintained throughout the duration of the programme.

Forced Marriage

Forced marriage is different from, and should not be confused with, an arranged marriage. To force a person to marry someone against their will is an abuse and a criminal offence. The Government has established a Forced Marriage Unit (FMU) to offer support and guidance to agencies. Suspicion that a student is being placed in a potential forced marriage situation must be referred to the SO immediately.

Training

The SO receives training in Safeguarding to a Level 3 standard. Programme Leaders, Campus Managers, Student Advisors and other key personnel will be trained to a Level 2 standard. The SO undergoes refresher training to keep knowledge up to date.

Data Protection and Record Keeping

Confidential records will be kept for all students regarding any alleged or suspected abuse. Individuals should report any such suspicions or any disclosed safeguarding issues using the pink Safeguarding Form (Appendix 1) available from the Main Reception area at all Campuses as well attached to this document. No records of situations of alleged or suspected abuse must be kept in curriculum or public areas in the College;

this includes e-mail communication regarding a possible safeguarding issue that must be deleted. Any information about individuals will be kept confidential and locked away.

Work Placements

The College is committed that all learning environments are safe places for students to learn and staff to carry out their duties; this is particularly true of work placements. The college will ensure the suitability of work placement locations and the host organisation as set out within the Work Placement Handbook and the Tri-partite agreement.

Safeguarding concerns observed by student and college staff at the host organisation must be notified through the college Safeguarding Form (Appendix 1) plus the appropriate host organisation channels. In addition, any placement concerns can be raised directly with the college placement coordinator or relevant module leader.

Information Sharing and Confidentiality

The College acts appropriately with regard to confidentiality whilst still complying with stated duties of cooperation and integrated working between the college and appropriate external agencies, including Local Safeguarding Board and the Police while acting in the best welfare interests of our students.

Confidential information will not be shared without prior consent except in specific circumstances where the College's legal duties prevent this. Information will be used by the SO in connection with their duties. At times this may include disclosure to other relevant professionals such as the Police. This information will only be shared, on a need-to-know basis, after confirming the identity/authority of the person concerned.

When receiving phone calls requesting information about students, the following protocols must be followed:

- a) If a student is over the age of 18, no information may be shared with any party.
- b) If a student is under the age of 18 (or over the age of 18 and a vulnerable adult), the following information must be requested from the caller:
 - Name
 - Date of birth of student
 - Post Code of student's home address
 - Contact telephone number of the caller

Once this information is gained, the details of the query will be passed to the student directly and the student will choose if they wish to respond.

When a request for student information is made in person, the following protocols must be followed:

- a) If a student is over the age of 18, no information may be shared with any party.
- b) If a student is under the age of 18 (or over the age of 18 and a vulnerable adult), the following information must be requested from the visitor:
 - Details of the visitor are to be taken and the college staff to contact the student.
 - Administrator/receptionist/student advisor to pass the visitors details to the student
 - The student will then make the decision as to whether or not they will meet with the visitor

Appendix 1 “Pink” Safeguarding Form

UK College of Business and Computing

Safeguarding Form

Confidential

Date:

Definition of abuse: A form of maltreatment of a child or an adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Name of Student:	Course:
Date of Birth:	
Please indicate below what type of abuse is being reported.	
Physical Abuse: Example – a form of abuse which may involve hitting, shaking, throwing or otherwise causing physical harm to a child or vulnerable adult.	
Emotional Abuse: Example – the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and adverse effects on the child’s or vulnerable adult’s emotional development. i.e. Not giving a child or vulnerable adult opportunities to express their views, deliberately silencing them or “making fun” of what they say or how they communicate.	
Sexual Abuse: Example: Forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether the child or vulnerable adult is aware of what is happening.	

Neglect: *Example: the persistent failure to meet a child' or vulnerable adult's physical and/or psychological needs, likely to result in the serious impairment of the child or vulnerable adult's health or development.*

Other concerns – including Prevent:

This form is to be given to the Safeguarding Officer. This can be in person or by email safeguarding@ukcbc.ac.uk. You can talk to the safeguarding officer at any time - 0208 518 4994

Name of person reporting concerns:

Signature

Date concern reported:

Appendix 2

Definitions of Abuse and Neglect

Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child or vulnerable adult.

Sexual Abuse

Forcing or enticing a child or young person to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve:

- Physical contact including penetrative or non-penetrative acts
- Non-contact activities, such as involving vulnerable adults in looking at, or in the production of pornographic material or watching sexual activities.
- Encouraging vulnerable adults to behave in sexually inappropriate ways, including involvement in prostitution.

Emotional Abuse

The persistent emotional ill-treatment of a vulnerable adult to cause severe and persistent adverse effects on their emotional development. It may involve:

- Conveying to vulnerable adults that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person.
- Age or developmentally inappropriate expectations being imposed on vulnerable adults.
- Causing vulnerable adults frequently to feel frightened or in danger.
- The exploitation or corruption of vulnerable adults.

Some level of emotional abuse is involved in all types of ill-treatment of a vulnerable adult, though it may occur alone.

Neglect

The persistent failure to meet a child's or vulnerable adult's physical and psychological needs, likely to result in the serious impairment of their health or development. It may involve:

- Failing to provide adequate food, shelter and clothing
- Failing to provide a child from physical harm or danger
- Failing to ensure access to appropriate medical care or treatment
- Neglect of a child's or vulnerable adult's basic emotional needs
- Failure to ensure satisfactory education.

Financial Abuse

This includes theft, fraud, exploitation, the misuse of possessions and pressure applied in relation to financial transactions.

Discriminatory Abuse

This is based on a person's disability and includes making hurtful comments and harassing them.

Appendix 3

Procedure for dealing with allegations made against a member of staff

- Safeguarding enquiries by the Police are not to be confused with internal disciplinary enquiries by the College. The College may be able to use the outcome of external agency enquiries as part of its own procedures.
- The College will hold in abeyance its own enquiries while the formal Police investigations proceed.
- The Police may act independently of the College particularly where the allegation is unconnected to the member of staff's professional life. The Police may wish to interview other members of staff to enable them to gather the evidence.
- Any internal enquiries will conform to the College Staff Disciplinary Procedures.

Suspension of Staff

Suspension of staff member(s) should not be automatic. Suspension can only be carried out by the Senior Management Team (SMT). Suspension may be carried out at any stage of the investigation. It is a neutral, not disciplinary, act and will 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 child or vulnerable adult 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.

Prior to suspension, the SMT will interview the member of staff. This should only occur once approval has been sought from the appropriate agency from the Local Safeguarding Children Board (LSCB). If the Police are engaged in an investigation, the officer in charge of the case should be consulted.

The interview is not intended to establish a member of staff's innocence or guilt, but given the opportunity for the member of staff to make representations about possible suspension. The member of staff will be given time at the meeting to consider any information given to him/her and prepare a response.

The suspended member of staff should be given appropriate support during the period of suspension. He/she will be provided with information and developments in the case at regular intervals.

The suspension will remain under review in accordance with UKCBC's Staff Disciplinary policy.

Staff Disciplinary Investigation

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

Any substantiated cases will be reviewed by the Local Authority Designated Officer (LADO) and the case manager at LADO to identify any improvements required by the College policy or process.

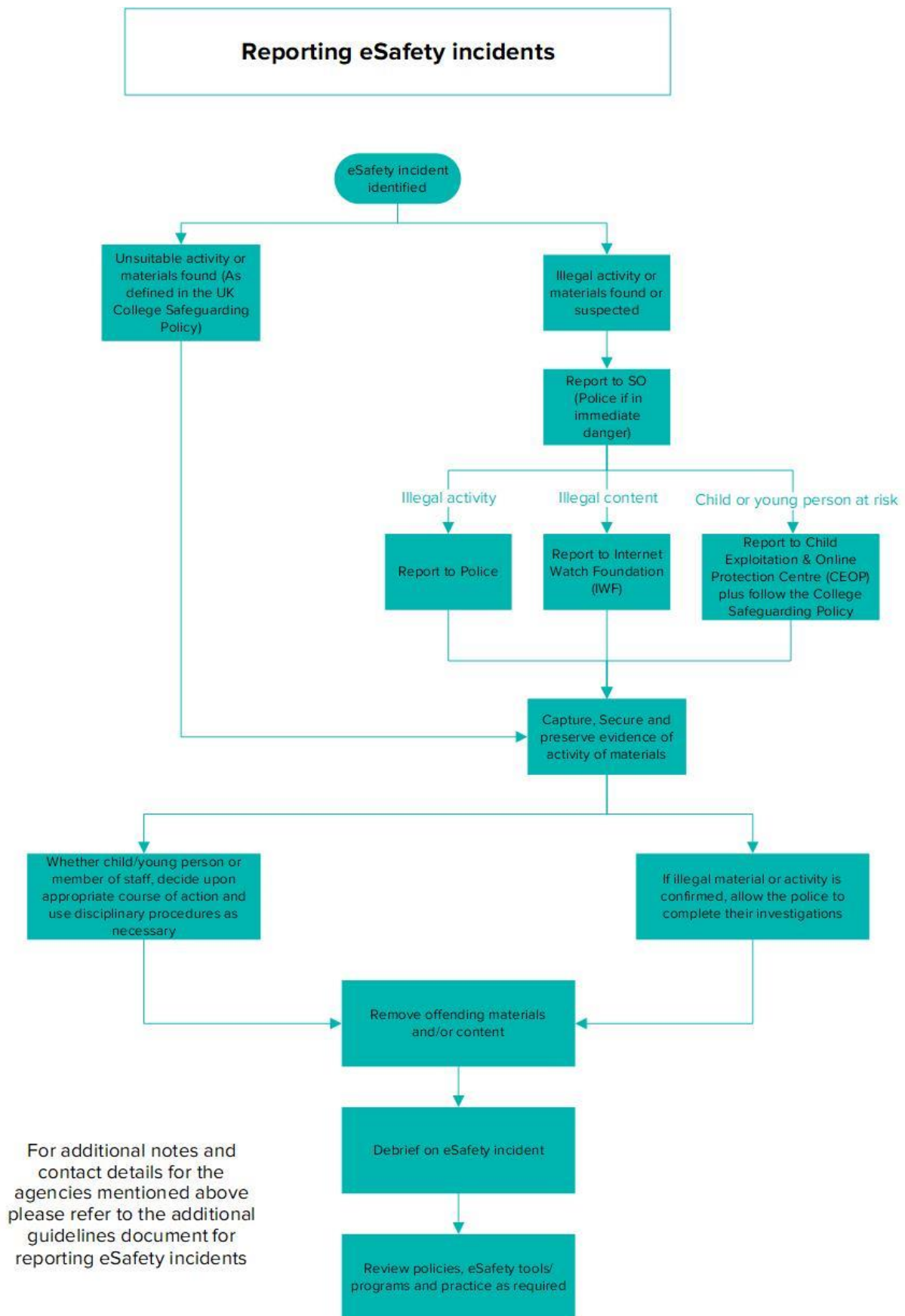
Allegations without Foundation

- False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LSCB in order that other agencies may act upon the information.
- In consultation with the SO and /or the nominated colleague, the SMT shall:
 - a) Inform a member of staff against whom the allegation is made, orally and in writing, that no further disciplinary or safeguarding action will be taken
 - b) Inform the student that the allegation has been made to the individual in question and once investigated the outcome reached
 - c) 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.

Records

- For safeguarding matters relating to staff members only: It is important that documents relating to an investigation are retained in the Human Resources Department, in a secure place, together with a written record of the outcome. If disciplinary action is taken, details will be retained on the member of staff's personal file, in accordance with the College disciplinary procedure.
- If a member of staff is dismissed or resigns or otherwise ceases to provide his or her services before the disciplinary process is completed, they should be informed that the College may make a referral to the DBS for consideration of inclusion on the barred list (formerly known as list99).
- There is a legal duty to refer the dismissal/removal of a member of staff for safeguarding reasons to the Disclosure and Barring Service (DBS).
- If an accused person resigns or ceases to provide their service, this should not prevent an allegation being pursued. A settlement/compromise agreement must not prevent referral to DBS.
- Detailed records should be confidentially stored until retirement or for a period of 10 years and not provided to the accused.
- Cases in which an allegation was found to be false, unsubstantiated or malicious should not be included in employer references.

Appendix 4



eSafety Incident	An eSafety incident is one where the misuse of technology has had a negative impact on the safety, security or wellbeing of young learners or staff members.
Capture evidence of activity or materials	This can be completed on a computer by taking a “screenshot”. Alternatively press the “print Screen” button on the computer where the offending material is visible on the monitor. Open a second program (e.g. Word or PowerPoint) and “paste” the image. In most programs this can be done by right-clicking anywhere on the page, then click “paste”. Type the computer number, the username and the name of the person taking the screenshot under the image before saving this file in a safe location (e.g. a password protected mobile device).
Illegal activity or materials found or suspected	Laws that may be contravened include The Computer Misuse Act 1990. The Protection from Harassment Act 1997, The Malicious Communications Act 1988 and Section 127 of the Communications Act 2003.
Report to Police	Phone telephone number 999 and ask for the Police if urgent, otherwise phone 020 8721 2562 to speak to the Metropolitan Safer Neighbourhood Team , and inform of the evidence/materials you have found.
Report to IWF	Internet Watch Foundation – www.IWF.org.uk , and click “report criminal content”.
Report to Safeguarding Person	Designated Safeguarding Person within the College is: Safeguarding Officer and supported by the Campus Managers 0208 518 4994; safeguarding@ukcbc.ac.uk
Report to CEOP	Child Exploitation and Online Protection www.ceop.gov.uk/reportabuse/ , and click “report” on the home page.
Capture, secure and preserve evidence of activity or materials	Use the “screenshot” method listed above but in the presence of a witness to demonstrate you have not tampered with the evidence. Sign a print out of the evidence file and have the witness countersign it. Then remove the computers involved from the network and store them securely. If the evidence is on a mobile device (e.g. mobile phone) ask the young person not to use the device until the Police have confirmed whether they would like to see it. If the young person needs to continue using it ask to take photos of the screen with a witness present and ask the student to not delete any evidence. The phone may be confiscated if necessary.
Remove offending materials and/or content where possible	The person who published the offending information is most able to remove it. If this is not viable contact a member of the IT Team on 0208 518 4994 .

Appendix 5

Conduct of Professional Relationships between Staff and Students

Introduction

As an equal opportunities employer, the College recognises the importance of promoting and preserving the integrity of professional relationships between staff and students. Professional relationships are essential in assisting in College to conduct its activities in a spirit of openness, fairness, consistency of treatment, mutual trust and respect. These guidelines apply to all employees at UKCBC working under a permanent, temporary, or variable hours' contract of employment. Relationships covered by these guidelines include:

- a) Contractual
- b) Sexual/romantic
- c) Financial
- d) Social
- e) Family
- f) Business/commercial

This list is not exhaustive.

The guidelines cover any issues where such relationships raise concerns about safety, conflict of interest, trust and/or confidentiality. Potential areas of concern include:

- a) Access to confidential information
- b) Accommodation
- c) Assignment work
- d) Evaluation
- e) Marking
- f) Research
- g) Tutoring
- h) Discipline
- i) Academic Guidance
- j) Assessment
- k) Counselling
- l) Learning
- m) Supervision
- n) Teaching

This list is not exhaustive.

Relationships between Staff and Students

Staff have a professional and ethical responsibility to protect the interests of students, to respect the trust involved in the staff/student relationship and to accept the constraints and obligations inherent in that responsibility. The development of staff/student relationships should be governed by professional ethics.

UKCBC will not tolerate staff entering into any personal relationships with a student. Any relationship formed between a member of staff and student, within the College setting or context, develops from a position of unequal power. Such a relationship is likely to create problems in maintaining the boundaries of professional and personal life. A relationship of this kind can also disrupt the teaching and learning environment for other students and

colleagues. Staff must discourage the development of inappropriate patterns of behaviour with students by the maintenance of an appropriate distance.

The existence of a relationship with a student's family member or with friends or associates who subsequently become students will always give rise to similar professional and ethical issues.

Procedure

Should any personal relationship begin to develop, or if a member of staff has concerns about how a student perceives their relationship with them, the staff member must discuss this with their line manager or another relevant member of College staff in the first instance.

All staff have a responsibility to formally and confidentially raise concerns about the inappropriate behaviour of other members of staff with their line manager and where appropriate the relevant Programme Leader or Academic or Campus Manager.

To avoid any misconceptions about relationships, false allegations and to deter inappropriate situations from developing, staff are strongly discouraged from socialising outside the College with students, particularly on a one to one basis.

Where there is evidence that a relationship may not be truly consensual, a complaint will be handled under the appropriate policy/procedure.