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**CITY OF LONDON COLLEGE**

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A UNIVERSITY SECTOR PREMIER COLLEGE

# **Safeguarding Policy**

**2024/2025**

# CLC Safeguarding Policy

I confirm that I have received, read and understand and agree to abide by the CLC Safeguarding Policy.

.....  
Signature

.....  
Date

.....  
Print Full Name

.....  
Team/Department

Please return this page to the Human Resources Department and retain the rest of this document for your information

# SAFEGUARDING POLICY

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## 1. Policy Statement

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All young people (children) and vulnerable adults have the right to protection, to be listened to and to have their opinions heard. CLC is committed to ensuring all apprentices on its scheme have the best opportunity to train and work in an informed and appropriate environment.

CLC will ensure that the rights of young people (children) and vulnerable adults are respected regardless of race, gender, disability, religion, sexual orientation, family status, age and social background.

This Policy is implemented in conjunction with CLC's Equality and Diversity (GO2), Bullying and Harassment and Health and Safety (GO9) Policies.

### **Roles and Responsibilities**

All CLC employees and workers contracted by CLC, who have primary contact for supporting and/or managing provision to an individual or individuals in their work and/or learning environment, and those who have secondary contact, will be responsible for implementation of this Policy.

All CLC employees and workers will abide by current UK legislation and follow procedures as set out in this Policy.

It is not the responsibility of CLC employees to decide or diagnose whether abuse or harm has taken place; however, it is their responsibility to report any concerns, no matter how minor, regarding abuse or harm to CLC's Lead Safeguarding Officer.

## 2. Reporting and Recording Procedure

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All CLC employees and workers have a duty to report any concerns they may have that a young person (child) or vulnerable adult may be at risk of harm or abuse, even if the young person (child) or vulnerable adult has asked for the incident to be kept confidential between themselves and the member of staff.

Employees are encouraged to report:

- if abuse or harm is suspected;
- if abuse or harm is witnessed;
- when an allegation of abuse or harm is made;
- when a young person (child) or vulnerable adult discloses abuse or harm.

CLC reporting procedures (all records will be kept confidential):

1. Any suspected abuse or harm must be reported to CLC's Lead Safeguarding Officer who, if appropriate, will refer and liaise with all relevant parties.
2. Any disclosure or allegation must be reported and recorded using the incident reporting facility on the company's internal management system within 24 hours.
3. CLC's Lead Safeguarding Officer will notify (if appropriate) the Director of the incident.
4. Individuals who report the allegation, or make the disclosure, are required to keep the matter confidential and only discuss it with CLC's Lead Safeguarding Officer or designated safeguarding person(s) and not the alleged victim/accused or any other members of staff.
5. If the allegation is reported by a sub-contracted Training Centre (College), the person who has designated safeguarding duties at the Training Centre will liaise with CLC's Lead Safeguarding Officer and any other relevant parties.
6. Staff based at CLC must inform the Centre's designated safeguarding person and/or CLC's Lead Safeguarding Officer of any incidents immediately.
7. If an allegation is reported, the Centre Manager will liaise with CLC's Lead Safeguarding Officer. Information regarding the incident will be limited to staff responsible for teaching the learner.

CLC's Lead Safeguarding Officer will keep all relevant parties informed of the outcome if/as appropriate (See Figure 1 on page 10 for flow chart).

CLC will support the young person (child) and/or vulnerable adult at all times and ensure that they are signposted to the most appropriate organisation for guidance, information and counselling services. The young person (child) and/or vulnerable adult will be treated with dignity throughout this entire process.

### 3. Information Sharing

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It is important to note that, when any suspicions or allegations of harm or abuse have been reported to CLC's Lead Safeguarding Officer, the information obtained may be shared with outside agencies to ensure the safety and welfare of the young person (child) or vulnerable adult and to provide the most appropriate care or services needed to protect the individual who may be at risk of harm or abuse.

#### **Storage of Information**

Information recorded during any investigation/discussions must be kept confidential at all times by CLC's Lead Safeguarding Officer. After a case has been closed, records will be held separately in a locked cabinet only accessible by CLC's Lead Safeguarding Officer.

#### **Recruitment and Selection/CLC Staff**

CLC will only recruit employees who have the required skills and experience and who have satisfactorily passed all of its recruitment vetting checks. These checks include, but are not limited to, identity, academic qualifications, professional references and previous employment history. An Enhanced Disclosure and Barring Service (DBS) check and necessary approvals will be required for all employees coming into contact with young people (children) and vulnerable adults.

#### **Recruitment and Selection/Learners**

Applicants who have identified or declared themselves as having, for instance, a disability, learning difficulty or medical condition, or are from a care background, may be classed as vulnerable. Where identified and evidence obtained, appropriate support will be provided to enable the applicant to undertake CLC's initial assessment.

#### **Medical/Vulnerability Learner Risk Assessment**

A Medical/Vulnerability Risk Assessment for a CLC-approved learner (?) will be undertaken for all those identified as vulnerable at application stage. The risk assessment is to ensure that appropriate provision is in place to meet the individual learner needs.

#### **Filming and Photography**

Field staff are equipped with smartphones and one of their functions will be to capture the apprentice's photo ID for JTL's internal record system, JIB Registration, the apprentice's CSCS ID card and for gathering site assessment evidence for the apprentice's NVQ portfolios only.

#### **Photo Consent**

All learners will be required to complete a Learner Consent Form – Photography & Filming (?) at the start of their apprenticeship/traineeship. Images or films captured will be used from time to time for marketing purposes. Any images captured will be stored securely and held by the marketing department. This also includes any young person/child visiting CLC, either as an independent or as part of school activity. Photos of CLC events will be published on CLC social network platforms, as well as its website. All photographs are taken in accordance with the guidelines relating to photos in schools published by the Information Commissioner with regards to the Data Protection Act 1998

and are carefully selected so as not to cause offence or distress to children, young people or parents.

### **Campaigns/Events**

Where campaigns/events involving any external organisations, such as schools, training providers and/ or young people, take place on CLC premises, the CLC organiser will need to liaise with relevant managers to ensure safety and safeguarding measures are in place prior to the campaign/event.

CLC will require external organisations to put in writing that it gives permission for its students/learners to be photographed at events. It is the responsibility of the event organiser to ensure that consent is given and evidenced.

A blanket consent form will be issued to external organisations as and when necessary for the external organisation to complete and send to CLC's Lead Safeguarding Officer.

### **Visitors to CLC**

All visitors to CLC offices must sign in at the reception and must wear a visitor's badge at all times. Visitors must be accompanied by a member of CLC staff.

### **Working Away from Home**

On occasion, apprentices may be asked by their employers to work away from home for a period of time. In accordance with CLC's Pre-Placement Vetting (PPV) procedures, employers are asked whether they have adequate procedures in place to ensure the safety of apprentices.

### **E-Safety**

As a training provider CLC acknowledges that e-safety is one of the integral components to keeping staff and learners safe. CLC provides safe access to the internet and digital technology to all staff.

Access to the internet or email on computers within CLC premises will be monitored. Internet filtering systems are in place to monitor and safeguard all from accessing inappropriate sites; this is regularly reviewed and monitored by IT to ensure the filters have not been compromised.

Downloading and forwarding copyright information or materials that may be considered defamatory, racist, homophobic, incites hatred or violence or sexually explicit will be treated as gross misconduct. Emails received and/or passed on that contain jokes or a sexual or racial nature or jokes that cause offence and can be considered as harassment should be reported.

### **CLC Field Trips**

Learners and staff are required to complete the following CLC documents, ???, prior to any CLC organised field trip: Next of Kin/Emergency Contact details. Learners are requested to inform CLC of any medical condition or medication that could affect their participation in a CLC organised field trip.

## **Radicalisation/Prevent – Counter-Terrorism**

The Prevent Strategy is an integral part of the Counter Terrorism strategy and it aims to deter people from being drawn into, promotion or support of terrorism. Where a learner or a member of staff has been identified as being vulnerable or radicalised, CLC will refer the individual to Prevent Coordinators via the Channel Programme for assessment and support. CLC has a Prevent Strategy in place and a prevent policy guidance that sets out CLC's responsibilities.

### **CCTV**

The use of closed-circuit television (CCTV) is in operation across CLC premises both internally and externally. The system comprises of a number of fixed cameras located around the training centre. All cameras are monitored from a central desk that is only available to designated staff.

The CCTV system is registered with the Information Commissioner in compliance with the Data Protection Act 1988 and the Commissioner's code of practice.

Materials and images captured on CCTV will not be used for any marketing purposes or released to the media. Images will only be released for use in an investigation of a specific incident and only with written request from the authorities such as the police.

### **PPV (Pre-Placement Vetting)**

Prior to commencing on a CLC scheme, the employer's arrangement for Health, Safety and Welfare (HSW) for learners will be assessed. Employers will be required to demonstrate that they have adequate procedures in place.

The information gathered is recorded on the PPV Form for business and/or domestic premises (?) and is continually monitored, updated and reviewed every three years.

### **Data Protection**

CLC stores and processes information in compliance with the Data Protection Act (1998).

### **GDPR (General Data Protection Regulations)**

There will be times when staff may have concerns, or be made aware of concerns, regarding a learner. The person being informed of the concerns must ensure that they inform the Lead Safeguarding Officer within one working day. The only exception to informing any of the above is if one of them is the subject of the concerns. If that is the case, then they will be excluded. At no time should the person who is the subject of the allegations be informed.

General Data Protection Regulation (GDPR) requires that privacy notices are supplied to those whose information is received by CLC. This includes direct disclosures from the parties involved and third-party reports about others.

### **Complaints**

For any complaints on how an incident has been handled or the process taken, including outcome, employees and workers are advised to follow the procedure outlined in Complaints Register (?). The complaint should be reported to the Quality Assurance Manager who will manage the complaint.



## 4. Definition

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Young Person (Child) is defined as a person under the age of 18 years old.

Vulnerable Adult is defined as a person aged 18 years old and over who may be unable to take care of themselves, or protect themselves from harm or from being exploited. This may be because they have a mental health problem, a disability and learning difficulty, a sensory impairment, or have some form of illness.

Learner is defined as an apprentice or a learner on a traineeship.

Vulnerable Learner (for CLC purposes) includes both young people and vulnerable adults from the age of 16 years onwards who have been identified as being vulnerable.

Abuse is defined as physical abuse, sexual abuse, emotional abuse, organised abuse, neglect and bullying. Depending on the nature of the abuse, this could lead to a criminal offence and conviction.

Harm is defined as damage, injury or distress to a person, which can be either physical or psychological.

Outside Agencies (not limited to):

- Social Services/Social Care Team/Local Authority Designated Officer;
- Police;
- NSPCC;
- Schools;
- Colleges;
- Training Providers;
- Channel Programme.

## 5. Legislation

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CLC complies with all relevant legislation, in particular, but not limited to, the following:

- Children Act (1989);
- United Nations Convention on the Rights of the Child (1989);
- Human Rights Act (1998);
- Sexual Offences Act (2003);
- Children Act (2004);
- Safeguarding Children Working Together for Positive Outcomes (Welsh Assembly Government 2004);
- What to Do if You're Worried a Child is Being Abused (HM Government 2006);
- Safeguarding Vulnerable Groups Act (2006);
- Protection of Freedoms Act (2012) Part 5 Chapters 1–3;
- Working Together to Safeguard Children (2015);
- Counter Terrorism and Security Act (2015);
- Apprenticeship, Skills and Learning Act (2009);
- Education Act (2011).

### **Lead Safeguarding Officer:**

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In the absence of the Lead Safeguarding Officer, please refer any concerns to the Human Resources Director.

6. **Figure 1**

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