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One Miah Group Ltd – OMG Education CIC  
4 Pinchin Street, Whitechapel, E1 1SA



## OMG Education Safeguarding Policy



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## KEY CONTACTS AT OMG Education

### FIRST POINT OF CONTACT FOR ALL SAFEGUARDING CONCERNS

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### DEPUTY DESIGNATED SAFEGUARDING LEAD FOR OMG

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## KEY CONTACTS WITHIN THE LOCAL AUTHORITY

The Safeguarding in Education Service is able to provide advice and consultancy in non-emergency situations

[https://www.towerhamlets.gov.uk/lqn/health\\_social\\_care/children\\_and\\_family\\_care/child\\_protection.aspx](https://www.towerhamlets.gov.uk/lqn/health_social_care/children_and_family_care/child_protection.aspx)

The Tower Hamlets Local Safeguarding Partners (Tower Hamlets Safeguarding Children Board) can provide advice and training. The Local Safeguarding Partners



[info@omgeducation.co.uk](mailto:info@omgeducation.co.uk)



[omgeducation](https://www.instagram.com/omgeducation)



OMG Education



within Tower Hamlets consist of; the Tower Hamlets Council, The Accountable officer for the East London Integrated Healthcare, the Managing Director of the Tower Hamlets Clinical Commission Group CCGs and Tower Hamlets Metropolitan Police.

<https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/THSCPArrangements.PDF>

#### REFERRAL TO LOCAL AUTHORITY SOCIAL SERVICES

If you feel that a child is at immediate risk of harm, please call the Police on 999 who will be able to provide an immediate response. Alternatively, you can contact your local Police on 101 at any time.

If you don't believe the risk requires immediate action, contact the Tower Hamlets Agency Safeguarding Hub team (previously the Referral and Advice Team) to discuss your concerns on:

Tel: 020 7364 5006 (Monday to Thursday, 9am-5.15pm and Friday, 9am-5pm)

Tel: 020 7364 5006 (Out of Hours).

You will get to speak to a social worker who is part of the Tower Hamlets Multi Agency Safeguarding Hub (MASH) team. The social worker will need to gain as much information as possible about the child and the family.

If the young person does not reside in Tower Hamlets contact their home borough social services.



## SAFEGUARDING POLICY

This policy is in line with 'Keeping Children Safe in Education 2019'

"Because of their day-to-day contact with individual children, teachers and other staff are particularly well-placed to observe outward signs of abuse, changes in behaviour or failure to develop". (The Children Act 1989)

### 1. PURPOSE

1.1. An effective whole organisation safeguarding policy is one that provides clear direction to staff and others about expected behaviour when dealing with safeguarding issues. An effective policy also makes explicit OMG's commitment to the development of good practise and sound procedures. This ensures that safeguarding concerns, referrals and monitoring may be handled sensitively, professionally and in ways that support the needs of the learner.

1.2. Parents, carer's or other interested parties can obtain a copy of this safeguarding policy on request.

### 2. INTRODUCTION

2.1. OMG takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. "The welfare of the child is paramount" (Children Act 1989).

2.2. There are three main elements to our safeguarding policy:

- Prevention through the creation of a positive atmosphere and the teaching and pastoral support offered to learners.
- Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.
- Support to learners and staff who may be affected by safeguarding concerns or issues arising.

2.3. This policy applies to all learners, staff, volunteers and visitors to OMG.

2.4. OMG recognises it is an agent of referral and not of investigation.



2.5. All staff must maintain an attitude of 'it could happen here'.

### 3. POLICY

3.1. We recognise that for our learners, high self-esteem, confidence, supportive friends, and clear lines of communication with a trusted adult helps to prevent abuse. OMG will, therefore:

- Establish and maintain an environment where learners feel safe and secure and are encouraged to talk and are listened to.
- Ensure that learners know that there are adults within OMG who they can approach if they are worried or are in difficulty.
- Where possible, include in the curriculum activities and opportunities for personal social development (PSD), which equip learners with the skills they need to stay safe from abuse.
- Where possible, include in the curriculum material which will help learners develop realistic attitudes to the responsibilities of adult life.
- Ensure that wherever appropriate every effort will be made to establish effective working relationships with parents and colleagues from partner agencies.

### 4. FRAMEWORK

4.1. Safeguarding is the responsibility of all adults and especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of the Local Safeguarding Children Board (LSCB).

### 5. ROLES AND RESPONSIBILITIES

5.1. All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within OMG and the local authority who have specific responsibilities under safeguarding procedures. The names of those carrying out these responsibilities are listed on the cover sheet of this document.

5.2. It is the role of the DSL to ensure that all of the safeguarding procedures are followed within OMG, and to make appropriate, timely referrals to local authority social services in accordance with these procedures. If for any



reason the DSL is unavailable, a deputy DSL has been identified who will act in their absence.

- 5.3. Additionally, it is the role of the DSL to ensure all staff members (including temporary staff and volunteers) are aware of OMG's procedures, and to advise staff and to offer support to those requiring this.

### Senior Management Team's Role in Safer Recruitment:

- 5.4. The OMG senior management team are responsible for ensuring that OMG follows safe processes. As part of the OMG's recruitment and vetting process, enhanced DBS checks will be sought on all staff and volunteers that have substantial and unsupervised access to learners.
- 5.5. No member of staff will be allowed unsupervised access to learners until OMG has received the results of satisfactory references and DBS check. All new staff will complete a safeguarding self-disclosure form prior to starting work.

## 6. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM

6.1. Teachers and other adults in the Centre are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public that foster respect, confidence and trust can lead to disclosures of abuse and/or centre staff being alerted to concerns.

6.2. As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18<sup>th</sup> birthday.

6.3 **Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

6.4 **Abuse and Neglect** are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology



may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

**6.5 Recognising Abuse** To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example, by hitting them or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people. Four categories of abuse:

**6.6 Physical Abuse** is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

**6.7 Emotional Abuse** is the persistent emotional maltreatment of a child such as to causing severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**6.8 Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also



commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

**6.9 Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

*(Definitions taken from Keeping Children Safe in Education 2019)*

## **7.0 CHILD CRIMINAL EXPLOITATION: COUNTY LINES/ SERIOUS YOUTH VIOLENCE**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs, and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **7.1 Who is vulnerable to county lines exploitation/ serious youth violence?**





The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old are being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females are being exploited.
- White British children are being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users are being targeted so that gangs can takeover their homes (known as 'cuckooing').

OMG understands that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

*(Definitions taken from Criminal Exploitation of children and vulnerable adults: county lines guidance July 2017)*

## **SERIOUS YOUTH VIOLENCE PREVENTATIVE MEASURES:**

The DSL of OMG works closely with Tower Hamlets Safer Schools Officer to help identify and support learners who are at risk of serious youth violence. OMG carry out knife arch operations throughout the academic year with the support of Tower Hamlets Metropolitan police. OMG recognises that learners may carry weapons for a variety of reasons, and we are dedicated to supporting and educating our learners on the potential risks involved when carrying a bladed weapon. If a learner is to bring a bladed weapon onto the premises, we will work closely with them, their parents/carer and the Police to ensure that the incident has been reported to the relevant local agencies and to ensure that appropriate intervention and support are put in place.



OMG Senior Management assisted with Youth Workers carrying out random searches of learners to ensure that they were not carrying any offensive or dangerous weapons. Any weapons found will be reported to and seized by the Metropolitan Police with a likely referral to the local authority Children's Services/ Bronze panel. If a staff member becomes aware that a learner is using more than one phone (usually an indicator of potential involvement in county lines), this should be reported to the DSL immediately so the DSL can notify the parent/carer of the learner to help safeguard the learner from exploitation or potential involvement in county lines.

### **8.0 CHILDREN WHO MAY BE PARTICULARLY VULNERABLE TO ABUSE**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- learners who are looked after by the local authority or care-leavers
- asylum seekers
- living away from home
- vulnerable to being bullied or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.





## 9.0 SAFEGUARDING LEARNERS WITH SPECIAL EDUCATIONAL NEEDS

OMG recognises that learners with special educational needs may be more susceptible to abuse and staff members are aware that behaviour, mood and injury may relate to possible abuse and not just their SEN or disability. All staff will take into account that changes in behaviour and/ or demeanour may not necessarily be linked to their disability but to consider the potential for abuse as a reason for these changes. OMG understands that there is a higher risk of peer group isolation, bullying and difficulties with communication for learners who have educational needs. OMG DSL, SEN Manager, and Student Services Department liaise and work together to minimise the potential of abuse and recognise any signs of abuse or change in behaviour. Learners with special educational needs have a higher risk of being isolated by their peers and maybe disproportionately affected by bullying. To provide pastoral support for these learners, they will be encouraged to partner up with a staff mentor which they can trust to ensure that regular communication is in place and to provide the learner with a designated adult that they can trust.

## 10.0 FEMALE GENITAL MUTILATION (FGM)

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM.

FGM refers to procedures of any alteration involving partial or total removal of the external female genital organs. The procedure may lead to short term and long-lasting harmful consequences such as death, trauma, infections, flashbacks, infertility, kidney problems, sexual dysfunctions, incontinence, post-traumatic stress disorder etc. It is known to be practised in the North African countries, the Middle East, Indonesia, Malaysia, India and Pakistan. However, with migration worldwide, it is also practised in the UK, the USA, Canada, Australia etc.

One of the prominent reasons for the practice is to suppress women's sexual desire. There is social pressure on women to undergo the procedure; otherwise, they may be segregated by their peers or labelled "unclean". Furthermore, FGM is often a requirement for getting married in practising communities. FGM is not a religious practice.

### 10.1 Indicators

There is a range of potential indicators that a girl may be at risk of FGM.



FGM often takes place in the summer holidays, as the recovery period after FGM can be 6 to 9 weeks. Professionals should be mindful of at-risk times when children go on long holidays and/or are getting a visit by a female elder from their country of origin. Additionally, girls are considered at risk where their mother or sisters have undergone FGM, and girls are talking about a 'special' event or procedure to 'become a woman.'

The post FGM symptoms include but are not limited to difficulty in walking, sitting or standing, spending longer than normal in the bathroom or toilet, unusual behaviour after a lengthy absence, reluctance to undergo normal medical examinations, and asking for help but not being explicit about the problem due to embarrassment or fear. They can sometimes ask about their friend's problem rather than their problem. Professionals should raise an alert to child social care via the MASH if they have any FGM concerns.

Further information on warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines and Chapter 9 of those Guidelines (pp42-44), which focuses on the role of schools and colleges.

## 10.2 Actions

The United Nations addresses FGM as a violation of human rights. In the UK, FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking girls outside of the UK to have FGM carried out will be punished under the FGM act 2003 and Serious Crime Act 2015. LBWF follows a comprehensive approach comprising prevention, punishment, enforcement, support and protection measures to safeguard young girls from FGM.

If staff have a concern, they should activate local safeguarding procedures via the MASH, using existing national and local protocols for multi-agency liaison with Police and children's social care. When mandatory reporting commences in October 2015 (see below), these procedures will remain when dealing with concerns regarding the potential for FGM to take place. When a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the Police.

## 10.3 Mandatory Reporting Duty

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance, this will apply to schools and colleges.





Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers<sup>1</sup>, along with social workers and healthcare professionals, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils – it is likely that discovery will be made by disclosure by the student, parent or otherwise. These cases must be referred to Police (via the local CAIT team or by calling 101). Immediate reporting is required if FGM has been performed recently, and in historical cases, reporting must take place within one month.

Mandatory reporting duty will commence in October 2015. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Centre's DSL and involve children's social care as appropriate.

### Schools can also:

- Circulate and display materials about FGM
- Display relevant information (for example, details of the NSPCC's Helpline and appropriate black and minority ethnic women's groups)
- Ensure that a private telephone is made available should students need to seek advice discreetly
- Inform colleagues/raise awareness of the issues around FGM – as well as include appropriate training in continuing professional development
- Introduce FGM into the centre curriculum in relevant classes, such as personal, social and health education (PSHE), citizenship, religious knowledge, drama and history

### Reference and further information

- [Keeping children safe in education, DfE](#) (see page 83)
- [Multi-agency practice guidelines: FGM, Home Office, DfE](#) (see pages 8, 16, 17 and 42)
- <http://www.londonscb.gov.uk/fgm/>

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<sup>1</sup>“teacher” means—

(a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England);  
(b) in relation to Wales, a person who falls within a category listed in the table in paragraph 1 of Schedule 2 to the Education (Wales) Act 2014 (anaw 5) (categories of registration for purposes of Part 2 of that Act) or any other person employed or engaged as a teacher at a school (within the meaning of the Education Act 1996) in Wales.



For support around training around FGM for teachers and students, please contact:

- Solace Women's Aid - 07340 683382
- Lotus Clinic (Whipps Cross Hospital) - 07949 075814
- Project Azure, Metropolitan Police - 020 7161 2888
- NSPCC Female Genital Mutilation (FGM) helpline - 0800 028 3550
- FORWARD – FGM Specialists - 020 89604000  
Email: [naana@forwarduk.org.uk](mailto:naana@forwarduk.org.uk).
- Daughters of Eve – FGM Specialists - 07983 030 488 or 07961797173

### **10.5- Alternative Provision (14-16-year-old learners)**

OMG Education provides alternative provisions for 14-16 years old on-site under the organisation 'One Miah Group. OMG will ensure that all 14-16 years old are appropriately safeguarded whilst studying on-site and will have their wellbeing needs met appropriately. Alternative Provision students are supplied with an orange coloured lanyard so they can be easily identified when in the building with 16+ learners. Students in Alternative Provision students will be under staff supervision at all times, and staff members will liaise with parent/carer/ Referrer in regards to any attendance or behavioural issues. Alternative Provision learners will not share classes with 19+ learners.

### **11.0 PEER ON PEER ABUSE**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms.

This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

#### **11.1 How is risk minimised?**

Before enrolment, prospective learners are given the opportunity to state whether they have a criminal conviction. Learners' names will be sent to our Metropolitan Police Schools Officer, who can run a background check on the learner with details of all previous convictions. The Head of Curriculum will then complete a risk assessment



and discuss any concerns with SMT/DSL as to whether OMG can accept the learner who could potentially pose a threat to other young people and staff in the building.

### **11.2 How will OMG deal with allegations?**

OMG will respond to allegations by using the steps in our disciplinary policy, taking into account case-by-case and note the need for contextual safeguarding for a response. OMG understands that peer on peer abuse must never be tolerated as 'banter' and will be investigated with utmost importance.

### **11.3 How OMG will support the victim and perpetrator?**

OMG ensures to listen and take into account the wishes of the victim/victims and perpetrator in moving forward. Referral to DSL/Student Services department will establish what support will be offered to both victim and perpetrator, ensuring that the child's education is not compromised. Cases may be referred to external organisations such as local authority social care in order to provide the victim/perpetrator with the support needed.

### **11.4 How are incidents recorded?**

All safeguarding incidents are recorded and logged securely online on a password-protected document.

### **11.5 How will allegations be investigated?**

OMG will investigate allegations in line with our disciplinary procedure. OMG recognises that criminal allegations will be reported to the Police but must not wait for the outcome of the police investigation (as this could be detrimental to the young person receiving education on-site).

## **12.0 CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT**

### **Context:**

1. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
3. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support

and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and centre staff are supported and protected as appropriate.

### 12.05 Upskirting

*"[Upskirting] typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm".*

*(Definition taken from KCSIE 2019)*

On 12<sup>th</sup> April 2019, a new law came into force across England and Wales, and offenders can now be arrested and sent to prison. The Voyeurism Act outlaws 'upskirting' where the purpose is to obtain sexual gratification or to cause humiliation, distress or alarm. This includes instances where culprits say images were just taken 'for a laugh' or when paparazzi are caught taking intrusive images. OMG will respond to any allegations of 'upskirting' by speaking with all parties involved and obtaining advice from our Safer Schools Officer on how to proceed. Police and prosecutors have now updated their guidance to ensure the law is properly enforced – with offenders facing up to 2 years in jail and being placed on the sex offenders register.

### 12.06 Sexting/ Youth Produced Imagery

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18-year-olds with or by adults. This is a form of child sexual abuse and must be referred to the Police.

When an incident involving youth produced sexual imagery comes to a centre's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with the appropriate centre staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the Police immediately.



## 12.1 Immediate Response to a Report of Sexual Violence/Harassment

When a learner discloses an allegation of sexual violence and/or sexual harassment from their peer, this must be immediately shared with OMG Designated Safeguarding Lead, who will meet with the victim and accused learner to understand the nature of the incident. Staff members must ensure that all victims are being taken seriously and that they will be supported and kept safe. When dealing with a response of sexual violence/harassment, it is vital that OMG take into consideration the wishes of the victim, how they would like to move forward and to assure all victims that their allegation is being taken seriously. OMG will strongly consider the following advice:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- Is the alleged incident is a one-off or a sustained pattern of abuse?;
- Are there ongoing risks to the victim, other children, adult students or centre staff?; and
- Other related issues and wider context.

## 12.2 Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the Centre, especially any actions that are appropriate to protect them;

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the Centre should be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

*(Definitions taken from 'Sexual violence and sexual harassment between children in schools and colleges May 2018)*

## 13.0 CHILDREN MISSING FROM EDUCATION

### Introduction - overview

1. All children, regardless of their circumstances, are entitled to an efficient, full-time education that is suitable to their age, ability, aptitude and any special educational needs they may have.
2. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.
3. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receive suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risk of a child going missing in future

*(Definitions taken from 'Keeping Children Safe in Education 2019')*

### 13.1 Children at particular risk of missing education

There are many circumstances where a child may become missing from education, so it is vital that local authorities make judgements on a case by case basis. Although not exhaustive, the list below presents some of the circumstances that local authorities should consider when establishing their CME policies and procedures:

- a. Pupils at risk of harm/neglect – Children may be missing from education because they are suffering from abuse or neglect. Where this is suspected, schools should follow local child protection procedures. However, if a child is in immediate danger or at risk of harm, a referral should be made immediately to the children's social care (and the Police if appropriate). Local authority officers responsible for CME should check that a referral has been made and, if not, they should alert children's social care. The Department's statutory guidance on Keeping children safe in education provides further advice for schools and colleges on safeguarding children.
- b. Children of Gypsy, Roma and Traveller (GRT) families – Research has shown that many children from these families can become disengaged from education, particularly during the secondary school phase
- c. Children of Service Personnel – Families of members of the Armed Forces are likely to move frequently – both in the UK and overseas and often at short notice.
- d. Missing children and runaways – Children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction, as well as missing education.
- e. Children and young people supervised by the Youth Justice System – Children who have offended or are at risk of doing so are also at risk of disengaging from education. Local authority Youth Offending Teams (YOTs) are responsible for supervising those young people (aged 8 to 18).
- f. Children who cease to attend a school – there are many reasons why a child stops attending a school. It could be because the parent chooses to home educate their child. However, where the reason for a child who has stopped attending a school is not known, the local authority should investigate the case and satisfy itself that the child is receiving a suitable education.
- g. Children of new migrant families – children of new migrant families may not have yet settled into a fixed address or may have arrived in a local authority area without the authority becoming aware, therefore increasing the risk of the child missing education.

### 13.2 Response to Children's Missing Education

If a learner has not attended their first lesson, OMG support Tutors will attempt to contact the learner on their personal mobile number. If contact with the learner is not possible, OMG Tutors may contact either one of the two emergency contacts in order

to find out the whereabouts of the learner. If the learner missing education is in care, LAC Manager/OMG Support Tutors will liaise with the foster carer/key worker/ social worker to understand why the learner is absent and how we can support their return to education.

## 14.0 EMERGENCY CONTACTS

The Keeping Children Safe in Education 2019 government policy states that all schools and colleges must obtain more than one emergency contact for each learner. OMG requests two emergency contacts for all learners, including; name, relation to the learner, mobile number, email address, workplace name and address. This is to ensure that we are able to contact one of two key adults to the learner in the case of an emergency.

## 15.0 PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL, and the Centre should notify the local authority of the circumstances.

### 15.1 DOMESTIC ABUSE

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse. It can

happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is really distressing and scary for a child and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear it from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse.

Domestic abuse can happen in any relationship, and it affects young people too. They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen or ashamed about what people will think.

## 15.2 CHILD SEXUAL EXPLOITATION

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or, in some cases, simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The Centre includes the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation, and all concerns are reported immediately to the DSL.



The MASE is the Multi-Agency Sexual Exploitation meeting, which is held on a monthly basis and is co-chaired by Children's Social Care and the Metropolitan Police. The MASE has two purposes:

1. For professionals to refer young people who are at risk of or are experiencing sexual exploitation: who are subject to a plan (Child Protection, Multi-agency or Child in Need) but for whom the risks are not decreasing and specialist advice or support is required
2. To refer information/intelligence about possible venues/people involved in sexual exploitation. This information will then contribute to developing a strategic overview and understanding of sexual exploitation in Waltham Forest

Please see the relevant documents below:

- [MAP \(multi-agency planning\) and MASE \(multi-agency sexual exploitation\) meetings - local guidance document](#)
- [WFSCB CSC referral letter](#)
- [WFSCB MASE referral form](#)
- [Pan-London Child Sexual Exploitation operating protocol \(February 2014\)](#)

## 16.0 PREVENT and anti-radicalization

16.1. At OMG, we are fully aware and committed to the ongoing protection and safety of our pupils, staff and the wider community in accordance with DfE guidance '*Working together to Safeguard Children*' (2018) and '*Keeping Children Safe in Education*' (2019). An integral part of that work relates to the government's PREVENT strategy and the duties it places on academic institutions.

16.2. Our organisation is committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our organisation recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. Staff will be alert to issues including:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of the Centre, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites





- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture

16.3. By continually developing our leadership and accountability practices, staff training opportunities (primarily the Home Office developed WRAP Training), referral systems and management of those referrals, we strive to demonstrate a proactive and diligent approach to this aspect of our responsibilities as educators and safe guardians.

16.4. Aligned with consistent delivery of a broad and balanced curriculum and use of the Local Authority-approved Self-Assessment framework, we strive to protect our students - and the wider community - against the threats of extremism through the promotion of both fundamental values and cohesion amongst our communities.

We also recognise that further information and support are available from the Multi-Agency Safeguarding Hub (020 8496 2310), the Local Authority's Community Safety Team 020 7364 5601 and the PREVENT Education Officer/Citizenship and Cohesion Advisor for TH [simon.smith@towerhamlets.gov.uk](mailto:simon.smith@towerhamlets.gov.uk) 0207 364 4691

## 17.0 Online Safety

Whilst learners can access free WIFI at the campus, Internet usage is restricted, and our IT systems automatically block anyone from accessing a site that is deemed inappropriate to be visiting whilst in a learning environment. OMG learners may be required to access the Internet in lessons under the instruction of their tutor for coursework and/or research purposes. At no time should learners be using the Internet on their mobile devices during the lesson. OMG Tutors have introduced procedures to stop learners from using their phones in lessons, e.g., phone box (all phones to be placed in a secure box before the lesson, phones are returned at the end of the lesson).

OMG have implemented our content filtering software on WIFI networks. This system will then block any inappropriate content. This software is an added layer to help safeguard students from any inappropriate websites or content.

## 18.0 PROCEDURES

18.1 All action is taken in line with the following guidance;





- Local Safeguarding Children Board (LSCB) guidelines
- London child protection procedures 2018
- Keeping Children Safe in Education September 2019
- What to Do If You're Worried a Child Is Being Abused 2015
- Working Together to Safeguard Children July 2018

18.2 OMG staff who work unsupervised will be kept informed about safeguarding responsibilities and procedures through induction, briefings and awareness training. There may be other adults in the company who rarely work unsupervised, more usually working alongside members of staff. However, the DSL will ensure they are aware of and work within OMG's policy.

18.3 Any member of staff, volunteer or visitor to OMG who receives a disclosure or allegation of abuse, or suspects that a learner may have suffered significant harm or be at risk of suffering significant harm, or who notices possible signs or indicators of abuse must make an immediate telephone report to the DSL or in their absence, the deputy designated DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff available as a matter of priority.

18.4 The DSL will immediately refer cases of suspected abuse or allegations of abuse to the local authority (Children's Social Care or the LADO as appropriate) by telephone. If known, include the following:

- The learner's name, gender, address, date of birth, family composition, ethnicity, religion, any special needs
- The reason for the referral, including details of any significant events in the learner's life
- Details of any allegations made, including verbatim reports of any relevant conversations
- The learner's current location and emotional/physical condition
- Identity of those with parental responsibility and details of whether they are aware of the referral
- The name of the person who initially received the disclosure plus any advice given

18.5 The young person concerned must be informed that this information is being passed on to the OMG DSL, who will deal with information in line with this policy. There may be exceptional cases where it is judged that the referral should be made without the consent of the young person, and this is a matter of judgment for the DSL.



18.6 The telephone referral to the local authority Children's Social Care must be confirmed in writing by the end of the working day.

18.7 The DSL should follow up with local authority Children's Social Care within 24 hours of the referral to determine the outcome of the referral and any action to be taken. The DSL is responsible for establishing the outcome of the referral.

18.8 Staff are responsible to make direct referrals in the unlikely case of an emergency if they can't find the DSL or believe that their concern is minimised or not taken seriously.

18.9 OMG is committed to sharing referral information with the learner's parents/carers unless doing so could place the learner at greater risk of harm or impede a criminal investigation. On these occasions, advice will be taken from local authority social services or the Police.

18.10 The reporting member of staff must, as soon as possible, but at the latest by the end of the working day, make a written record of the disclosure of their concerns and send it via email to the DSL, who will record it in the learner's record.

18.11 Where concerns do not relate to the immediate risk of significant harm, the DSL will discuss the concerns with relevant colleagues and agree on a plan of action which will be recorded by the DSL in the learner's notes.

18.12 Where concerns about the safety or wellbeing of a young person exist, it may be appropriate to approach relevant agencies (former schools, colleges etc.) to see if there is any relevant information available.

## **19.0 TRAINING AND SUPPORT**

19.1 All staff will undertake appropriate safeguarding awareness training to equip them to carry out their responsibilities for safeguarding effectively, and training will take place at least annually to ensure that staff are up to date with current learning.

19.2 OMG will ensure that the DSL undertakes a DSL refresher training every two years with annual training to ensure that their knowledge and skills are up to date. This may include specific issues training, multi-agency training delivered by the LSCB or attendance at the safeguarding forums held by the Senior Safeguarding Lead for LB WF.

19.3 Temporary staff and volunteers who work with learners at OMG will, through induction training, be made aware of the company's arrangements for safeguarding and their responsibilities.



19.4 Support is available for staff from the DSL where there are concerns or queries about safeguarding.

19.5 All staff are offered guidance on the boundaries of appropriate behaviour and conduct. These matters form part of staff induction, and this guidance is available in the staff handbook. All staff and volunteers sign the OMG code of conduct to which they are expected to adhere at all times.

19.6 All staff have access to guidance on how to spot indicators of potential abuse. This guidance is available in the staff handbook.

19.7 All staff who receive a disclosure from a learner will have access to a counselling service.

## **20.0 PROFESSIONAL CONFIDENTIALITY**

20.1 Confidentiality is an issue that needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.

20.2 The only purpose of confidentiality in this respect is to benefit the learner. A member of staff must never guarantee confidentiality to a learner, nor should they agree with a learner to keep a secret, as where there is a safeguarding concern, this must be reported to the DSL and may require further investigation by appropriate authorities.

20.3 Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a "need to know basis". Any information shared with a member of staff in this way must be held confidentially by them.

20.4 Where sharing will be in the best interests of the relevant learner, information will be shared with other organisations.

## **21.0 RECORDS AND MONITORING**

21.1 Well-kept records are essential to good safeguarding practice. OMG is clear about the following:

21.1.1 The need to accurately record any concern held about a learner within the company

21.1.2 The status of such records

21.1.3 When these records should be passed over to other agencies.





21.2 Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must email the details to the DSL. All records will be dated and will include the action taken. These notes are kept in a confidential electronic learner record.

21.3 If a learner transfers from OMG, these files may be copied and forwarded to the learner's new establishment marked confidential and for the attention of the DSL if this is deemed to be in the learner's best interests.

## **22.0 ATTENDANCE AT SAFEGUARDING CONFERENCES AND CORE GROUPS**

22.1 It is the responsibility of the DSL to ensure that OMG is represented or a report is submitted to any safeguarding conference called for learners on the programme at OMG or previously known to them. Whoever attends should be fully briefed on any issues or concerns OMG has and be prepared to make decisions on registration at the end of the conference.

22.2 When a learner is the subject of a child protection plan, it is the DSL's responsibility to ensure that the learner is monitored regarding their attendance, welfare and presentation.

22.3 If OMG is part of the core group, then the DSL should ensure that OMG is represented at these meetings; that there is a record of attendance and issues discussed.

22.4 All concerns about the CP plan and/or the learner's welfare should be discussed and recorded at the core group meeting unless the learner is at further risk of significant harm before the meeting date. In this case the DSL must inform the learner's key worker immediately and then record that they have done so and the actions agreed.

## **23. YOUNG APPRENTICES AND LEARNERS ON WORK PLACEMENTS**

- Where young apprentices or under 18s who are on work placement are working on their own with the placement provider, OMG will conduct an enhanced CRB check and an ISA check (if appropriate) on that individual.
- OMG will provide guidance to placement providers as to appropriate action they should take if a learner discloses to them.



- OMG will provide guidance to young apprentices or learners who are on a work placement as to the action they should take if they have any concerns about their placement.

## 24. RISK ASSESSMENT OF TRIPS AND VISITS

24.1 In order to safeguard learners, all activities that take place outside of OMG designated training centres must be prepared for and risk assessed in accordance with the policies and procedures in the staff handbook.

24.2 Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

## 25. SUPPORTING LEARNERS AT RISK

25.1 OMG recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place.

25.2 OMG, maybe the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at OMG, their behaviour may still be challenging and defiant, or they may not actively participate.

25.3 OMG will endeavor to support pupils through:

- i. The curriculum to encourage self-esteem and self-motivation.
- ii. The organisational ethos which promotes a positive, supportive and secure environment and which gives all learners and adults a sense of being respected and valued.
- iii. The implementation of OMG's behaviour management policies.
- iv. A consistent approach agreed upon by all staff which will endeavor to ensure the learner knows that some behaviour is unacceptable, but s/he is valued.
- v. Regular liaison with other professionals and agencies that support learners and their families.
- vi. A commitment to develop productive, supportive relationships with parents and carers whenever it is in the learner's best interest to do so.
- vii. The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- viii. Recognition that statistically, children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with learners with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.

- ix. Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, learners may also be vulnerable and in need of support or protection.

## **26. TEACHING CHILDREN HOW TO STAY SAFE**

### **INDUCTIONS**

#### **Health and Safety Induction**

During induction, students are taken through OMG policies and procedures whilst studying on-site at our campus. Health and Safety induction ensures that students are aware of fire escapes, who the designated member of staff is for Health & Safety, who the designated first aiders are and where to find them, how to raise the fire alarm, who to report hazards to, fire assembly points and who to contact in case of emergency. Students complete and sign the Health and Safety questionnaire and provide it back to Building Manager to sign off.

#### **IT Induction/ Acceptable Use**

IT Induction and Acceptable Use Policy is intended to ensure that students will be responsible users and stay safe whilst using the Internet and other communications technologies for educational, personal and recreational use. IT induction covers social networking, safe surfing, cyberbullying and mobile phone safety.

#### **Student Services and Safeguarding Induction**

Our Youth Mentor introduces the service and team to all students during enrolment, including what support is available and what to do if a student does not feel safe or is worried about their safety or their peer's safety. Students are encouraged to drop into the Student Services Hub for help and support in regards to their emotional wellbeing, academic progression, sexual health and financial help. Designated Safeguarding Lead is introduced to all students during enrolment and will be based in the Student Services Hub to allow easy access to emotional support or disclosures.

### **DELIVERY OF SDP LESSONS**

OMG delivers PSD (Personal Social Development) lessons to all students on our study program and Alternative Provision. PSD lessons cover a wide range of topics such as healthy relationships, substance misuse, bullying, democracy, stress management, employability, and PREVENT. Delivering PSD sessions to students allows class discussion of important issues facing young people and provides an

awareness of these topics, helping our students to keep themselves safe whilst working towards employability/ further education.

## **SAFER SCHOOLS' OFFICER**

OMG, work closely with Metropolitan Police Safer Schools' Officer. This partnership and presence of SSO increases levels of safety for staff and students on-site and provides a direct bridge to Metropolitan Police services.

## **PREVENT & ANTI-RADICALISATION TRAINING**

London Borough of Tower Hamlets PREVENT Officer attends PSD sessions to meet with students and brief them around anti-radicalisation and resilience.

## **USE OF REASONABLE FORCE**

Keeping Children Safe in Education 2019 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard students. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, standing between students or blocking a student's path to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent a student from:

1. Committing an offence
2. Causing personal injury to any person (including themselves) or damage to property
3. Prejudicing the maintenance of good order and discipline at the college

The term 'reasonable' in these circumstances means 'using no more force than is needed. OMG Education recognises that reasonable force should be considered especially careful when dealing with learners with SEN, disabilities or medical conditions. These groups are particularly vulnerable, and staff should refer to individual learning plans as necessary. This includes occasions when a student is not on college premises, e.g. on college visits and trips.

## **27. ALLEGATIONS AGAINST STAFF**

27.1 When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.



27.2 A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils, and we must act on every allegation.

27.3 Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option, and alternatives to suspension will always be considered. In some cases, staff may be suspended, where this is deemed to be the best way to ensure that children are protected. In the event of a suspension, the Centre will provide support and a named contact for the member of staff.

27.4 Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

27.5 Allegations concerning staff who no longer work at the Centre or historical allegations will be reported to the Police

27.6 Where an allegation is made against any person working in or on behalf of the Centre that he or she has:

- a. behaved in a way that has harmed a child or may have harmed a child;
- b. possibly committed a criminal offence against or related to a child; or
- c. behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children (refer to statutory guidance for schools and colleges; Keeping Children Safe in Education (2019))

We will apply the same principles as in the rest of this document, as well as always follow the procedures outlined in the above-mentioned document. This includes allegations against staff in their personal lives.

Whilst we acknowledge such allegations (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly, in line with agreed procedures and outcomes recorded.

### **Initial Response to an allegation or concern:**

Initial action by the person receiving or identifying an allegation or concern

- Treat the matter seriously and keep an open mind





- Make a written record of the information, including the time, date and place of incident/s, persons present and what was said and sign and date this
- Immediately report the matter to the most senior person in the organisation.

### **Initial Action by the DSL**

If the DSL is the subject of the allegation, then the senior management team will take the following action. OMG reserve the right to contact the LADO (Local Authority Designated Officer) for advice and steps on how to proceed if any other staff member is the subject of an allegation.

- Obtain written details of the concern or allegation, but do not investigate or interview child, adult or witnesses
- Contact the LADO within one working day
- Discuss with the LADO the next steps using the London Child Protection Procedures Flow Charts Allegations/Concerns Against Staff
- Inform the management team of the allegation
- Staff members in question must be informed if the allegation has been reported to the LADO and the likely course of action to follow unless instructed not to be the police/children's social care.

### **Subsequent Action by the DSL/ Director of Operations (Deputy DSL)**

- Conduct a disciplinary investigation if an allegation indicates the need for this.
- Contribute to the child protection process by attending professional strategy meetings.
- Maintain contact with the LADO.
- Ensure clear and comprehensive records regarding the allegation, action taken, and outcome is retained on the staff member's personnel file.
- Duty to refer to DBS if a staff member has been dismissed or removed due to safeguarding concerns (as well as if the staff member has chosen to resign instead of dismissed).

### **Tower Hamlets LADO Contact Details:**

**Melanie Benzie 0207 364 0677**

**Email- [melanie.benzie@towerhamlets.gov.uk](mailto:melanie.benzie@towerhamlets.gov.uk)**

## **28. ALLEGATIONS AGAINST FOSTER CARER IF A CHILD IS LOOKED AFTER**







- If a student who is looked after by their local authority discloses a safeguarding or child protection concern relating to their carer, this will immediately be reported to:
  - The local authority LADO
  - The supervising Social Worker
  - The student's Social Worker
  - Local Authority MASH team

## 29. WHISTLEBLOWING

- We recognise that children cannot be expected to raise concerns in an environment where staff members do not do so.
- Therefore, all staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in accordance with the OMG whistleblowing policy.

## 30. COMPLAINTS

- Complaints by young people can be made under the complaints procedure in the learner handbook.
- Complaints by staff can be made under the complaints procedure in the staff handbook.

## 31. POLICY REVIEW

- The OMG senior management team is responsible for ensuring the annual review of this policy. Previous versions of the policy are to be kept to demonstrate progress and developments made
- The OMG senior management team is responsible for ensuring that the list of key contacts on the cover sheet is kept up to date.

## 32. OUT OF HOURS SAFEGUARDING CONTACT

For safeguarding issues out of hours or during OMG holiday activities, immediately call Lead DSL Jamal Miah on 07498 330 265. If you believe a child or young person is at immediate risk of danger, call 999.





0208 159 3838

[www.omgeducation.co.uk](http://www.omgeducation.co.uk)

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Last updated	Next review	Person responsible
July 2022	July 2023	PP, WR