



## SAFEGUARDING POLICY

## **SAFEGUARDING POLICY**

### **1.**

### **2. Scope and purpose of the Safeguarding Policy**

Everyone who comes into contact with young people, vulnerable adults and their families has a role to play in safeguarding young people and vulnerable adults. Members of staff are particularly important as they are in a position to identify concerns early, to provide support and to prevent concerns from escalating.

This policy encompasses all aspects of safeguarding including e-safety, bullying and harassment (in person or electronically) and due regard to the prevention of young people becoming extremist or being radicalised. This policy should be read in conjunction with the relevant statutory guidance Keeping Children Safe in Education and Working Together to Safeguard Children.

Board of Directors is committed to ensuring that the College:

- Provides a safe environment for young people and vulnerable adults
- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that young people and vulnerable adults are kept safe, both at home and at the College.
- Promotes an environment in which every student feels valued and able to communicate their wishes and feelings successfully
- All staff receive safeguarding training which is regularly updated

All of our students, including young people and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse.

**All** members of the College community, including staff paid and unpaid, students, contracted and franchised staff, are responsible for safeguarding and promoting the welfare of young people and vulnerable adults and will be made aware of the College Safeguarding Policy and procedures.

### **3. Types of Abuse and Neglect**

#### **Children who may require early help**

Staff and volunteers working within the College should be alert to the potential need for early help for children. Staff and volunteers should consider following the procedures identified for initiating early help for a child or young person who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;

- Has returned home to their family from care; and/or
- Is showing early signs of abuse and/or neglect.

## **Child Abuse**

There are four types of child abuse as follows:

**Physical abuse:** 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.

**Emotional abuse:** Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

**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. It may include a failure 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);
- Ensure access to appropriate medical care or treatment;
- Neglect of, or unresponsiveness to, a child's basic emotional needs

**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 or 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **There are three main types of child sexual exploitation:**

- *Inappropriate relationships* - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- *Boyfriend* - Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

- *Organised exploitation and trafficking* - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

**Female Genital Mutilation (FGM)** refers to procedures that intentionally alter or cause injury to the female genital organs or non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

The Serious Crime Act 2015 sets out a duty on professionals to notify police when they discover that FGM appears to have been carried out on a girl under 18.

### **Domestic Abuse**

The Government defines domestic abuse as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

Psychological  
Physical  
Sexual  
Financial  
Emotional

Domestic Abuse does not necessarily involve physical violence and may include the following:

- The learner feels scared of angering their partner
- The learner is constantly being checked up on
- The learner is being isolated and may be kept away from friends or family
- The learner is being manipulated, which could involve the with- holding of affection as well as being lied to and shouted at
- Threats are being used for control
- Money or food are being with-held from the learner
- The learner is being repeatedly criticised, being told they are worthless, and humiliated in front of others?

If domestic abuse is suspected or reported then the staff should follow the guidelines outlined in appendices 2 and 3.

## **Preventing Radicalisation**

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside college
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

**Prevent Identification of Concern** - In the event of noticing changes about a student that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to the Prevent Lead (student welfare officer). The Safeguarding team will take action on a case-by-case according to the information given to them. The team will make any assessments or external referrals as required.

## **Self-Harming**

Self-Harming is becoming much more prevalent in society and our staff must be trained to spot tell-tale signs. Because self-injury is often kept secret, it may be difficult to spot signs and symptoms. Signs may include:

- Scars, such as from burns or cuts
- Fresh cuts, scratches or other wounds
- Bruises
- Broken bones
- Keeping sharp objects on hand
- Spending a great deal of time alone
- Wearing long sleeves or long pants even in hot weather

## **Modern Slavery and Human Trafficking**

Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

### ***Someone is in slavery if they are:***

- Forced to work - through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races.

## **Bullying**

While bullying between children and young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as the College operates a zero tolerance approach. Bullying can take many forms and includes:-

- Emotional:** Being excluded, tormented (eg hiding things, threatening gestures)
- Physical:** Pushing kicking, punching or any use of aggression and intimidation.
- Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- Verbal:** Name calling, spreading rumours, teasing.
- Cyber:** All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology ie camera and video facilities, sexting.

## **4. Culture of Safety**

We are committed to building a 'culture of safety' in which learners are protected from abuse and harm in all areas of its service delivery.

Candidates are informed of the need to carry out enhanced criminal records checks (DBS checks) before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We undertake criminal record checks for staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.

We take security steps to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the young people or vulnerable adults. We have procedures for recording the details of visitors to the college.

## **5. Roles and Responsibilities**

All adults working with or on behalf of our learners, including young people and vulnerable adults have a responsibility to safeguard and promote the welfare of them.

All staff will be informed of their responsibilities in being alert to the signs of abuse. Any concerns should be shared with the designated member of staff for child protection. The Designated Members of Staff for Safeguarding will receive training at least every two years.

All other staff who will have contact with children and young people will receive safeguarding training every three years.

Statistically young people with behavioural difficulties and disabilities are more vulnerable to abuse, staff need to be particularly sensitive to signs of abuse in these young people.

Staff will be provided with relevant information on a need to know basis about individual young people and vulnerable adults to keep them vigilant to any specific needs.

The College will support staff by providing an opportunity to talk through their anxieties with the Designated Members of Staff for Safeguarding.

## **6. Procedures**

Parents and carers may access the College's safeguarding policy. We will endeavour to discuss our concerns with parents and carers and seek their consent to refer concerns unless we feel that to do so would place a child at risk of, or cause further significant harm.

In all other circumstances, the parents must be informed at the earliest opportunity, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place.

If a child does not want their family informed then seek advice from a member of the Social Services/Police.

Telephone referrals to the relevant service for children/young people and adult social care for those over 18 years of age will be followed up in writing using the relevant form within 24 hours.

All Safeguarding records are subject to the General Data Protection Regulations. If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

## **7. Allegations against staff and adults in a position of trust**

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

If a young person or vulnerable adult makes an allegation against a member of staff at the College the Principal must be informed immediately.

If the Principal is implicated in the concerns you should discuss your concerns with the Local Authority Child Protection Officers who will initiate appropriate action in the same manner as allegations made against other staff.

If you have safeguarding or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people or vulnerable adults, you must inform the designated staff for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied

If an allegation of abuse is made against a member of staff in work based provision not directly linked to college, it must be reported to the Police. The Vice Principal must be informed.

The member of staff should have no contact with the young person concerned and must not be informed of the allegation prior to referral.

Any individual (including volunteers, paid employees and those in work based placements) who come into contact with young people and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

The Children Act 2004, through the Stay Safe outcome places a duty upon organisations to promote the well being of young people. This includes the need to



ensure that all adults who work with or on behalf of young people in these organisations are competent, confident and safe to do so.

The majority of adults who work with young people and vulnerable adults act professionally: Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact which would lead any reasonable person to question their motives and intentions.

It is recognised that working with young people and vulnerable adults can result in tensions between adults and the learner concerned such that misunderstandings can occur, and it is here that the behaviour of adults can give rise to allegations of abuse being made against them. The college has robust staff conduct guidance to ensure staff are aware of their responsibilities when interacting with children, young people and vulnerable adults.

However, allegations may be genuine and research shows that there are adults who will deliberately seek out, create or exploit opportunities to abuse young people and vulnerable adults.

## 8. Power and Positions of Trust

All adults working with young people and vulnerable adults are considered to be in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role. This equally applies to volunteers.

This means that adults should **not**:

- Use their position to gain access to information for their own or other's advantage.
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people / vulnerable adults
- Use their status and standing to form or promote relationships which are of a sexual nature or may become so.

This means that adults should:

- Ensure that an unequal balance of power is not used for personal advantage or gratification
- Maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- Report or record any incident where their behaviour may be misinterpreted with a Senior Manager at the earliest opportunity

## 9. Propriety and Behaviour

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people and vulnerable adults with whom they work or come into contact with. It is therefore expected that they will

adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and with their colleagues.

This means that adults should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model, or
- Make or encourage others to make unprofessional comments which scapegoat, demean or humiliate

### **What happens when an allegation is made against a member of staff?**

On receipt of a concern/allegation about an individual the following processes should be followed.

- whether it is a matter that can be properly dealt with under The College's disciplinary procedures or whether the Police and/or Children's Social Care might need to be involved.
- whether the parents/carers of the young person / vulnerable adult are aware of the allegation and in the event that they are not, how and by whom they should be informed. Parents may need to be informed immediately in specific circumstances, such as where a learner is injured or in need of medical attention.
- what support the learner and their parents/carers may require;

### **Suspension of a Staff Member**

Suspension is a neutral act taken by the employer, to provide a safe environment for the individual against whom the allegation has been made, learners and the College, whilst multi agency enquiries are undertaken.

Suspension can only be carried out by the Principal or a designated senior member of staff.

Individuals will be kept advised at each stage of the enquiries, and every effort will be made to ensure that the process is open and transparent.

Once the enquiries have concluded individuals will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.

In the event that the individual is the subject of a criminal investigation, which could lead to prosecution, the decision to inform the individual of this will be taken jointly by the Police and other relevant agencies at a Strategy Meeting.

Where the allegations have **not been substantiated** the employee will be reinstated to their duties.

Where the allegations have **been substantiated** then Principal will consider whether a referral should be made in respect of the employee to the appropriate

Independent Safeguarding Authority, who will consider whether the individual should be “barred” from working with children and young people.

Irrespective of whether allegations have or have not been substantiated a clear and comprehensive summary of the allegation, the enquiries undertaken, and a clear account of decisions taken and reasons for them will be held securely upon the employee’s confidential personnel file. The record will be held at least until the person has reached normal retirement age or for a period of ten years after the allegation was made, if this is longer. The responsibility for making sure that this happens is the College Principal.

## **10. Physical Contact and Physical Intervention**

Not all young people and vulnerable adults feel comfortable about physical contact. Adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Wherever possible, young people and vulnerable adults should be advised before physical contact or intervention is made.

It is recognised that some young people / vulnerable adults who have experienced abuse may seek inappropriate physical contact and adults should be particularly aware of this when it is known that a learner has suffered abuse.

### **Prevention of young and/or vulnerable people becoming extremist or being radicalised**

Prevent is one of four elements of CONTEST, the government’s counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of young and/or vulnerable people. In 2011, the government strategy of PREVENT was implemented.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The Counter-Terrorism and Security Act (2015) placed a duty on further education colleges to have due regard to the need to prevent people from being drawn into terrorism.

College has a responsibility to ensure that all staff and students have knowledge in recognising risk and addressing it appropriately. Strategies to meet this obligation include:

- To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism
- Staff Induction and briefing sessions
- Enrichment sessions
- To create opportunities for open discussion and to listen and support the learner voice
- To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
- Promotion of British values, namely democracy, rule of law, individual liberty, tolerance and respect for others.
- To ensure student safety and that the College is free from bullying, harassment and discrimination
- To provide support for students who may be at risk and appropriate sources of advice and guidance

### **Staff and Student Training**

Prevent training provide awareness that will enable staff to recognise signs, and to know what action to take in response to concerns. All staff will be offered this training in order to understand factors which make students vulnerable to extremist ideas and know what action they should take.

### **Referral**

**Identification of Concern** - In the event of noticing changes about a student that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to the Prevent Lead, Paul Smith. The Safeguarding team will take action on a case-by-case according to the information given to them. The team will make any assessments or external referrals as required.

## **11. Fitness to Study guidelines (Supporting learners with mental health needs)**

The College is committed to supporting student wellbeing and realises that a positive approach to the management of physical and mental health issues is critical to student learning and academic achievement. Additionally, the College has a duty of care to all within its community and a responsibility to take action to support those in distress, or causing significant concern and presenting a risk to self and others. This will include, for instance, situations where students show visible signs of illness, mental health difficulties or emotional disorders that may have a negative impact on the health, learning and wellbeing of others.

These guidelines have been written to ensure that a suitable response is given when it is not considered appropriate to apply disciplinary procedures. This may arise when a student's behaviour requires considered and sensitive management rather than disciplinary action.

Instances where Fitness to Study procedures may also be implemented include:

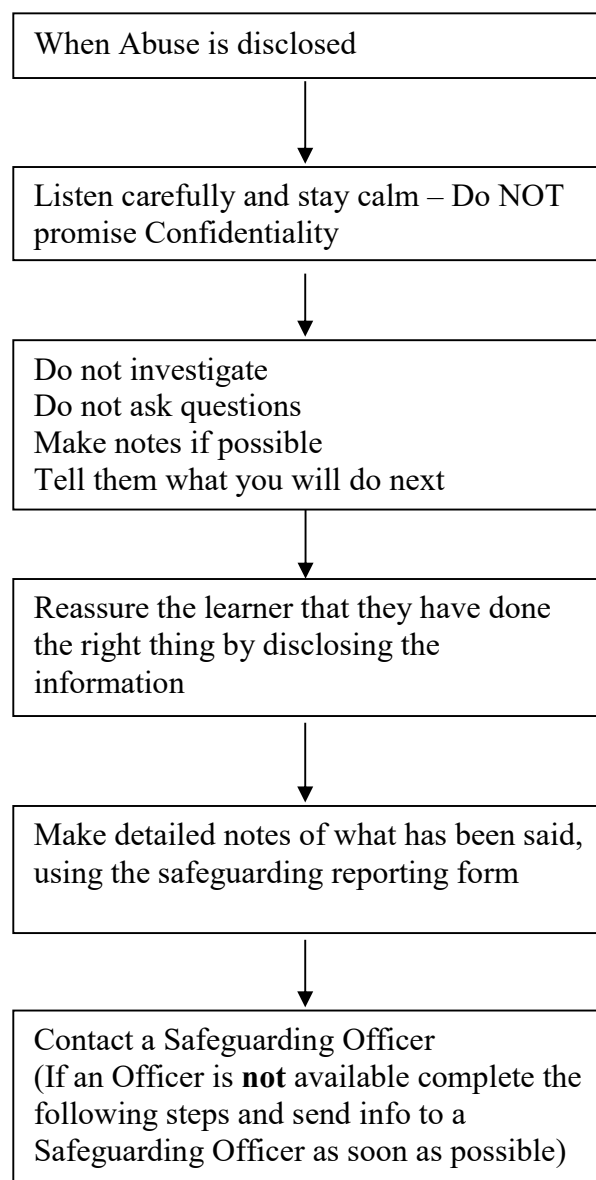
1. Where there are a number of worrisome third party reports regarding a student e.g. friends, staff
2. A student has not engaged in studies for a significant period without an apparent reason
3. There is a concern about how a student might manage whilst on a placement or a trip

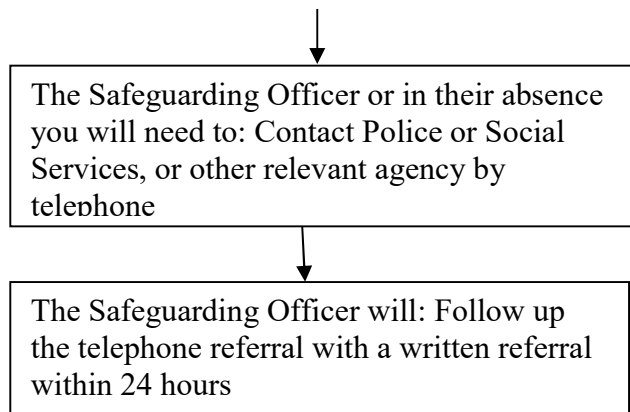
The college will refer student to appropriate support

### **Appendix**

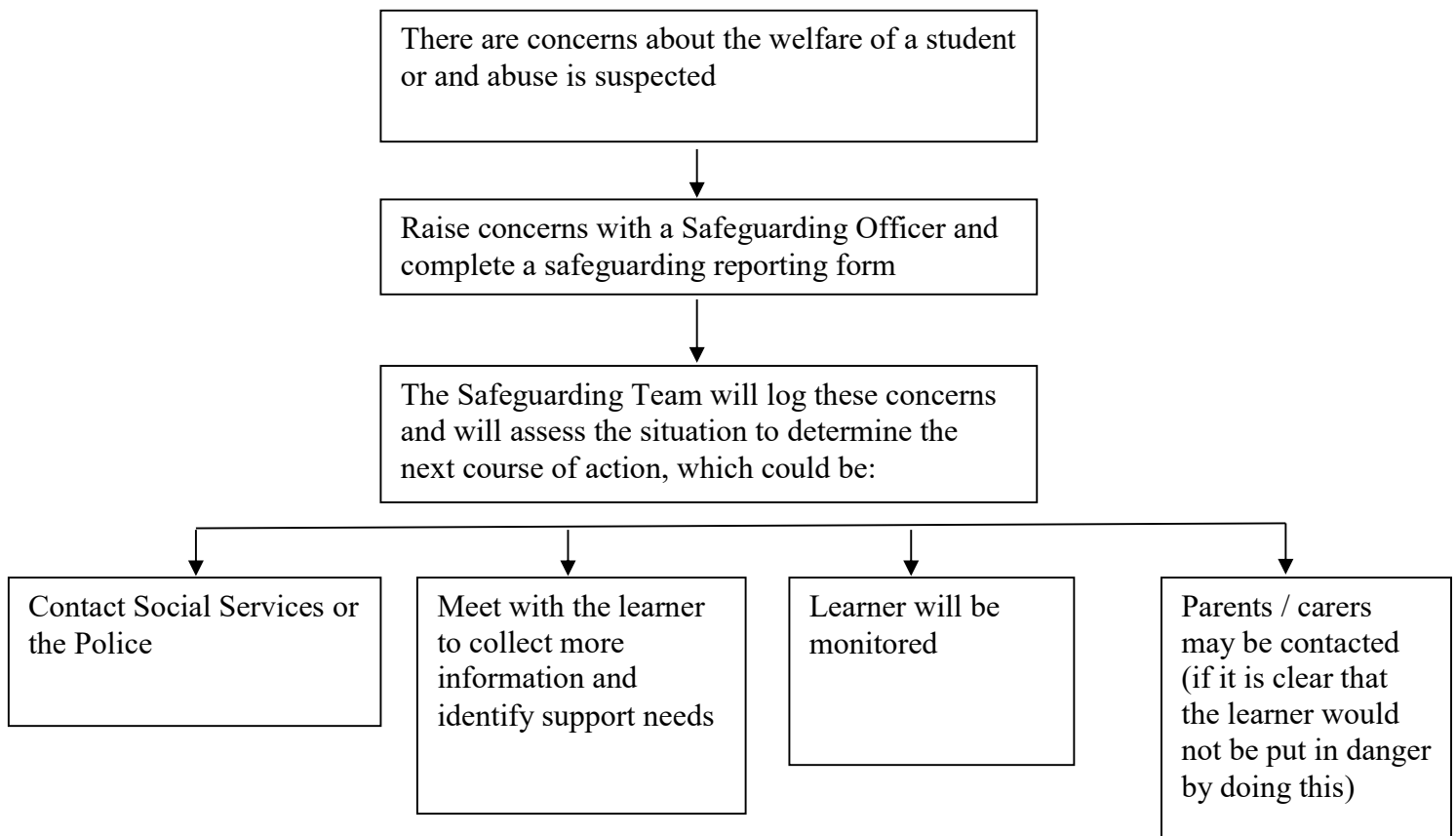
#### **Flow chart of procedures for reporting suspected abuse**

#### **ACTIONS TO TAKE WHEN ABUSE IS DISCLOSED**





**Actions to take when abuse is suspected**



**Safeguarding Incident/Concern Referral Form**

Safeguarding and Vulnerable Learner Incident/Concern Referral Form
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<b>Student Name</b>		<b>Person Code</b>	
<b>Date of Birth</b>			
<b>Course</b>			
<b>Member(s) of staff noting concern/disclosure</b>			

<b>Date &amp; time of concern/disclosure</b>	
<b>Details of concern/disclosure/incident (please describe as fully as possible)</b>	

<b>Other relevant staff involved (including agencies such as social services, police etc)</b>

**Please pass this form to a member of the Safeguarding Team once completed**

## **Safeguarding Do and Don'ts**

- Do find out who the designated safeguarding officer is and who the safeguarding team are.
- Do ensure that the person is not in immediate danger, if they are seek Police or medical assistance (999).
- Do find a quiet, secure area for you and the learner.
- Don't place yourself or anyone else in danger.
- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Do remember, that the child, young person or adult may not want their family informed. In this instance seek advice from a member of the Safeguarding team/Social Services/Police.
- Do not interfere with, or contaminate potential evidence following a physical or sexual assault, for example, by get the learner to wash, change clothing etc.
- Do listen and stay calm, you need to listen without making assumptions or judgements.
- Do not interview the child, young person or adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words in their mouth.
- Do reassure that by telling you, they have done the right thing.
- Do inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.
- Don't, in any circumstances, discuss the issue with the alleged perpetrator(s).
- Don't do nothing - tell Safeguarding or the relevant authorities immediately.



## **Important Contacts**

NSPCC Helpline	0800 800 5000
Child line	0800 1111
24 hour National Domestic Violence Helpline	0800 2000 247
Shelter – for housing advice	0808 800 4444
MIND – mental health charity	0845 766 0163
Victim Support	0845 30 30 900
National Stalking Charity	0808 802 0300
Survivors UK - Adult survivors of childhood abuse or male rape	
0845 122 1201	