



# **Safeguarding Policy 2018-19**

# **Safeguarding of Children, Young People and Vulnerable Adults**

## **Contents**

1. Key Contacts
2. Context
3. Commitment
4. Responsibilities
5. Definitions
6. Guiding Principles
7. Categories of Abuse or Harm for Children and Adults at Risk
8. Early Help and EHAT
9. Dealing with disclosure/suspicion of abuse
10. Preventing Violent Extremism
11. Information Sharing
12. Record Keeping
13. Liaison with other agencies
14. Wellbeing and Safeguarding Strategic Group
15. Safeguarding Operations Group
16. Safer Recruitment of Staff
17. Monitoring
18. Principal and Governors
19. Dealing with allegations made about members of staff
20. Implementation, Dissemination and Review

Appendix 1 Staff Guidelines/Reporting Procedures

Appendix 2 Procedures for Duty Safeguarding Officers

Appendix 3 Safeguarding Referrals using CPOMS

Appendix 4 Code of Practice for members of the Student Counselling Team

## 1. KEY CONTACTS

<b>COLLEGE SAFEGUARDING TEAM</b>	
Principal and Designated Safeguarding Lead (Child and Vulnerable Adult Protection)	Adam Rogers
Dean and Deputy Designated Safeguarding Lead (Child and Vulnerable Adult Protection)	Tom Fogden
Apprenticeship Lead and Deputy Designated Safeguarding Lead (Child and Vulnerable Adult Protection)	Hazel Colbe
Safeguarding Officer – Apprentices	Malachi Johnson
<b>LOCAL AUTHORITY CONTACTS</b>	
Single Point of Access	020 8489 4592 / 5652 / 5762 / 4582
Local Authority Designated Officer	020 8489 2968 / 1186 <a href="mailto:lado@haringey.gov.uk">lado@haringey.gov.uk</a> or <a href="mailto:Sarah.Roberts@haringey.gov.uk">Sarah.Roberts@haringey.gov.uk</a>
Haringey Local Safeguarding Children's Board	020 8489 1472 <a href="mailto:lscb@haringey.gov.uk">lscb@haringey.gov.uk</a>
Haringey Prevent	Concerns about a child: Call the Single Point of Access Concerns about an adult: 0208 489 3884 or 0208 489 1280 Concern that a student is currently involved in terrorist activity: Police or the anti-terrorist hotline immediately on 0800 789 321

## **2. Context**

These procedures have been developed in conjunction with the Safeguarding of Children and Adults at Risk Policy, and is fully compliant with all relevant legislation and guidance listed within the Policy.

In preparing this guidance we have consulted with, referred to, and worked within FE College's Safeguarding Children's Board's (XSCB) Child Protection guidelines and procedures and The College's Safeguarding Adults' Board Inter-agency Safeguarding Adults Procedures. This Guidance has been updated to include referrals to Channel in compliance with the Prevent Duty.

References to 'young people' have not been used within this document (apart from the definition provided in section 4) in order to clarify that children are defined as 'anyone who has not yet reached their 18th birthday'. The College believe that this will enable staff to maintain clarity when dealing with particular complex issues; e.g. vulnerability, capacity, (age of) consent and Child Sexual Exploitation, and with 'adults at risk' in line with local arrangements. The College further reinforces their duty of care to all students, irrespective of age, within all relevant training, guidance, policies and procedures.

### 3. Ada College's Commitment

Ada, National College for Digital Skills fully recognises its responsibility to have a clear and secure framework in place to safeguard and promote the welfare of students. Practitioners who work with children and students in this College will read this policy within the framework of the following guidance and legislation;

- Keeping children safe in education: statutory guidance for colleges and colleges (Sept 2018)
- Working Together to Safeguard Children (Jul 2018)
- Statutory framework of the Early Years Foundation Stage (Apr 2017)
- A Competency framework for Governance (Jan 2017)
- London Child Protection Procedures, 5<sup>th</sup> Edn.(2017) [www.londoncp.co.uk](http://www.londoncp.co.uk)
- Disqualification under the Childcare Act 2006 (Jul 2018)
- Data Protection Act 2018
- Information Sharing for safeguarding practitioners (Jul 2018)
- What to do if you're worried a child is being abused (2015)
- Children Act 1989
- Children Act 2004
- Education Act 2002
- Children and Families Act 2014

Through day-to-day contact with students and direct work with families, all staff and volunteers in College have a crucial role to play in noticing indicators of possible abuse or neglect at an early stage.

This policy sets out how the College's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of the students at this College. Our policy applies to all staff; paid and unpaid, working in the College including governors. It is consistent with the local safeguarding children's board (LSCB) procedures.

The College will ensure the following commitments are made:

- Every step will be taken to ensure that students of all ages are provided a safe environment conducive to learning. Students should be able to develop their personal, social, behavioural and educational skills in a supportive environment.
- Staff will be informed that procedures are in place and that these must be followed if staff become aware of a safeguarding issue. This applies to all staff, including temporary and supply staff and volunteers.
- Copies of the Safeguarding Policy and related Procedures will be made easily accessible and will be freely available, including on the college website.
- Appropriate reporting documentation will be easily accessible.
- A Safeguarding Team member will be nominated to act as the principal point of contact for co-ordinating and liaising with other agencies; e.g. local authorities, the Police, Channel, the Home Office, Careline/social services etc. These staff will receive specific training and guidance.

- Appropriate training will be delivered to all staff to ensure they are aware of the procedures to be followed, as well as the importance of the College's other related policies named on page 2 of the College's Safeguarding of Children, Young People and Adults at Risk Policy.
- Training will also ensure that all staff are aware of a range of safeguarding issues, including health-related risky behaviours, child sexual exploitation, grooming on social media, drug and alcohol misuse, domestic abuse, FGM, forced marriage, susceptibility to radicalisation and students showing signs of being drawn into extremist activity.
- Training will cover the development of the skills of staff in identifying the categories and signs of abuse and supporting students at risk of harm and/or with these issues.
- Ongoing liaison and collaboration with Ada's Safeguarding leads for both children and adults.
- Thorough risk assessments will take place which cover the range of College activities both on educational visits and on-site where appropriate.

### **3.1 Proactively Creating a Safe Environment**

We recognise that high self-esteem, confidence and good lines of communication with a trusted adult help to protect children. We aim to equip our children with the recognition, language and skills needed to keep themselves safe.

The college will therefore:

- maintain a college environment where children feel safe
- utilise curriculum activities to include opportunities which equip children with the skills they need to stay safe from , build self esteem, the skills to think independently and make sensible decisions based on their own judgements
- ensure children know that there are adults in the college whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
- ensure children know that there are adults in trusted positions external to the college, e.g. police or doctor, whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate
- equip children with the knowledge and skills they need to recognise and avoid risky behaviour in the real and virtual world
- Monitor the attendance and welfare of students and work with other agencies when issues are presented
- Engage with Early Help as an effective support tool to avoid the escalation of risky behaviours within families.
- Ensure Safer Recruitment guidance is adhered to in all appointments for regular activity in colleges

Parents understand the responsibility placed on the college and staff for safeguarding and child protection. They are able to access policies and obligations via the college's website.

### 3.2 Managing Adults to maintain a safe environment

We recognise that safeguarding children is everyone's business. Ada College will ensure all staff, trainees, volunteers and external providers in regular activity

- have up to date Disclosure and Barring Service checks
- have regular training in safeguarding
- have read statutory documents with regard to safeguarding
- are familiar with the categories, possible signs and the risk factors of abuse.
- understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated safeguarding lead
- The Designated Safeguarding Lead and deputies will be proactive in ensuring a safe environment for all children.
- The Principal will check the Single Central Record to ensure it is accurate.

In addition the college will ensure that we practice safer recruitment in checking the suitability of staff and volunteers to work with children. We follow the recommendations for Disqualification under the Childcare Act 2006 (2018) within recruitment.

### 3.3 Protecting vulnerable students

We recognise that children who have been abused or have witnessed violence towards others may find it difficult to develop a sense of self-worth. They may feel helpless, humiliation and some sense of blame. The college may be the only stable, secure and predictable element in the lives of children at risk.

We recognise that as a result some vulnerable children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

Additional measures of care are in place for children on, and sometimes formerly on, the Child Protection register including:

- notifying social care if there is an unexplained absence of a pupil who is on the child protection register
- ensure the college behaviour policy which is aimed at supporting vulnerable pupils in the college – i.e. the college will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse they have been subject to
- liaison with other agencies that support the pupil such as social care, the Child and Adult Mental Health Service (CAHMS), the Attendance and Welfare Service and the Educational Psychology Service

We also recognise that children with **Special Educational Needs and Disabilities** may find the understanding and communication of abuse difficult. Ada College will ensure key persons for these children are

- well equipped to be vigilant to changes in behaviour
- establish communication systems for reporting changes
- reduce the impact of social isolation
- target parents towards support for their own needs in coping with their child's SEND

- taught personal safety skills such as who to tell, good / bad touches and good / bad secrets as part of the PSHE and SRE curriculum The content of lessons will be shared with parents/carers so that these skills can be supported at home.

There is a high risk posed to **Children Missing From Education**. Children missing education (CME) are at significant risk of underachieving, being victims of abuse, and becoming NEET (not in education, employment or training) later on in life.

- We monitor pupils' attendance through a twice daily register. The college's welfare/admin staff make first day absence calls to families where a child is absent and the college have not been informed.
- The college will ensure it holds at least 2 emergency contacts for each child and will regularly update contact information to ensure it is accurate.
- under section 175 of the Education Act 2002 in respect of their pupils, and as part of this our welfare /admin/lead for pastoral care will investigate any unexplained absences.
- We inform the education welfare service immediately of any pupil who has been absent for 10 consecutive days, and despite the efforts of college staff, the family have not been located. This may include a home visit by college staff to verify the pupil's whereabouts. The local authority's education welfare service will then conduct further checks.
- If there are concerns about the attendance of a child who is subject to a child protection plan or who is looked after by the local authority, the college will also inform the child's social worker.
- If a parent reports that their child has gone missing from home, we ensure this has been reported to the police. If a child absconds from college during the course of the day, the parent will be informed, and if necessary or if the pupil cannot be located, the police will also be informed.

#### 4. Responsibilities

The College's safeguarding lead has overall responsibility for Safeguarding within the 'Safe College' agenda and child protection and vulnerable adults' protection issues, and acts as the College's Safeguarding Strategic Lead. A Designated Safeguarding Lead will oversee the operational functioning of Safeguarding procedures. The Designated Safeguarding Lead deals with cases involving under 16s (on 31st August in that academic year). They will have received comprehensive training in child protection issues and inter-agency working (as required by The College's Safeguarding Children's Board), will receive refresher training at least every 2 years and will keep up to date with developments in child protection issues. Both the strategic and operational safeguarding leads are also the designated Prevent coordinators for the College.

They are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Children's Services/Adult Services or other relevant agency, including Channel and/or the Police in relation to extremism and radicalisation.
- Liaising with Children's Services, Haringey Safeguarding Children's Board, Haringey Adult Safeguarding Board and other relevant agencies.
- Maintaining a proper record of any child protection/vulnerable adult referrals, complaints or concerns.
- Providing advice and support to other staff on issues relating to child and vulnerable adults' protection.
- Ensuring that staff receive written briefings and basic training in child and vulnerable adult protection and are aware of the college 'Safeguarding' procedures.
- Ensuring that parents, carers and sponsors are aware of the college's policy for safeguarding children, young people and vulnerable adults.
- Ensuring that appropriate arrangements are made for pupils from secondary colleges and sponsors who attend college.
- Ensuring that employers and training organisations that receive students from the college on placements put appropriate safeguards in place in line with the most recent government guidance.
- Ensuring that volunteers comply with college DBS requirements.
- Ensuring that procedures are in place for term time day visitors to sign in and for vetting external speakers.

## 5. Definitions

### Child(ren)

- 'Anyone who has not yet reached their 18th birthday.'  
*(Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children 2018)*

### Young People

- The phrase 'young people' has no single definition within published safeguarding guidance. It is often used to mean older children but may also refer to younger adults; e.g. Care Leavers 18-25.
- **Young people under the age of 18 should always be treated as children.**
- **Young people over 18 years should be considered potential 'adults at risk'.**
- They may still require actions taken by the college to help ensure their safety or have the need for advice and support in helping them to keep themselves safe.
- For the purposes of this guidance and for the avoidance of doubt, the phrase 'young people' will not be used further within this guidance document.

### Child Abuse

'A form 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 (e.g. via the internet). They may be abused by an adult or adults, or another child or children.'

*(WT2018)*

### Vulnerable Adult (or Adult at Risk\*)

- 'An adult who may be vulnerable to abuse or maltreatment is deemed to be someone aged 18 or over, who:
  - has needs for care and support (whether or not the authority is meeting any of those needs);
  - is experiencing, or is at risk of, abuse or neglect; and
  - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.'

*(Care Act 2014)*

\*The term Vulnerable Adult is used interchangeably with Adult at Risk within this document.

## **Abuse of Vulnerable Adults/Adults at Risk**

Abuse is defined widely and includes domestic and financial abuse. The Care Act 2014 states: 'Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'

The other crucial difference from previous definitions is that the duties apply regardless of whether the adult lacks mental capacity.

Ada College also acknowledges that specific social or cultural groups of people may also be at greater risk of harm and will therefore be more vulnerable, such as (but not exclusively):

- Those young people who are in or leaving public care
- Asylum seekers who are under 18 and/or who are independent from their parents
- Those who are under the supervision of the youth offending or probation service

## 6. Guiding Principles

### Children

Unless otherwise stated, definitions are from **Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children 2018 (WT2018)**.

#### **Guiding Principles:**

- 'safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part'
- 'a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children'  
(WT2018)

#### **Children have said that they need:**

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them
- **Respect:** to be treated with the expectation that they are competent rather than not
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans
- **Explanation:** to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- **Support:** to be provided with support in their own right as well as a member of their family
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views  
(WT2018)

#### **Safeguarding and Promoting the Welfare of Children:**

- 'protecting children from maltreatment';
- 'preventing impairment of children's health or development';
- 'ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and'
- 'taking action to enable all children to have the best outcomes'  
(WT2018)

## 7. Categories of Abuse or Harm for Children and Adults at Risk

### Children

- **Physical Abuse**

A form of abuse which 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 (or Psychological) Abuse**

'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 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.'

- **Sexual abuse including peer on peer abuse**

Any suspicion of sexual abuse or actual disclosure by a child that he or she has been sexually abused must be referred immediately to the MASH team, who will contact the appropriate investigative agencies.

Parents/carers should not normally be informed at this stage as this may jeopardise the investigation and the safety of the child. Where there is an allegation of, or concern about, sexual abuse a strategy meeting will be held in order to decide on the most appropriate way to proceed. The referrer will normally be invited to the strategy meeting.

[Further guidance is held in document: Sexual violence and harassment between children in schools and colleges \(May 2018\)](#)

- **Child Sexual Exploitation**

Someone taking advantage of a child sexually, for their own benefit. Through threats, bribes, violence, humiliation, or by telling them that they love them, they will have the power to get them to do sexual things for their own, or other people's benefit or enjoyment (including: touching or kissing private parts, sex, taking sexual photos).

**(WT2018)**

- **Neglect**

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 care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **Child Criminal Exploitation incl County Lines**

Child Criminal Exploitation refers to the use of children to conduct illicit activities normally for urban gangs, to allow them to operate in coastal or suburban areas

[Further guidance is held in document: Criminal exploitation of children and vulnerable adults \(Jul 2017\)](#)

## Categories of Abuse or Harm for Adults at Risk (Vulnerable Adults)

Unless otherwise stated, definitions are from **Haringey Safeguarding Adults Board: Inter-agency Safeguarding Adults Procedures 2013 (LSAB2013)**

### Abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes him or her harm, endangers their life or violates their rights. Abuse may be perpetrated as the result of deliberate intent, negligence or ignorance. Abuse may consist of a single act or repeated acts. It may be **physical**, **sexual**, verbal, financial or **psychological**. It may be an act of **neglect** or an omission to act or it may occur when a vulnerable person is persuaded to enter into any transaction to which he or she has not consented, or cannot consent. Abuse may be motivated by prejudice or hate; this would be defined as discriminatory abuse. An individual, a group or an organisation may perpetrate abuse.

### Other types of abuse affecting both Children and Adults at Risk

- **Financial or Material Abuse**

This may include theft, fraud, exploitation or pressure in connection with wills, property, enduring power of attorney, inheritance or financial transactions. This also includes the inappropriate use, misuse or misappropriation of property, possessions or benefits. Typical signs may be loss of jewellery or personal property; lack of money to purchase basic items; inadequate clothing; loss of money from wallet or purse, etc.

- **Neglect and Acts of Omission**

This may include the deliberate withholding of or failure to provide the help or support a person needs to carry out activities of daily living. It includes the failure to provide appropriate intervention or support to help a person, who does not have the capacity to assess risk or to deal with situations which are dangerous for them or others.

- **Self Neglect**

This is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

- **Discriminatory Abuse**

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion or belief, race or ethnicity, pregnancy and maternity status, or sexual orientation, gender reassignment, marriage and civil partnership (Equality Act, 2010). Recognised signs may be very similar to psychological and emotional abuse.

- **Hate Crimes/Incidents**

Any incident which may or may not constitute a criminal offence, which is perceived by the victim or other person as being motivated by prejudice or hate.

A Hate Crime or incident can be any incident which is usually targeted at someone or a family due to their race, disability, gender, age, religion, sexual orientation or transgender.

- **Radicalisation and/or extremist behaviour**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

There is a legal duty to reduce or eliminate the risk of individuals becoming involved in terrorism. 'Prevent' involves the identification and referral of those susceptible to violent extremism into appropriate interventions.

Safeguarding in this context, is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.

- **Trafficking**

The United Nations (UN) defines Trafficking in people as: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation.

Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in persons' even if this does not involve any of the means as set out above.

- **Domestic Violence and Abuse**

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, including **teenage relationship abuse**. This can encompass but is not limited to the following types of abuse: Psychological, Physical, Sexual, Financial and Emotional.

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition includes '**honour' based violence, Female Genital Mutilation and Forced Marriage**, which are against the law, and is clear that victims are not confined to one gender or ethnic group.

### **Other Areas of Safeguarding Concern**

- Bullying/Cyberbullying and the impact of new technologies
- Drug or alcohol misuse
- Exposure to gang activity and/or youth violence
- Involvement in relationships which may cause concern
- Potentially dangerous environments; e.g. work placements/workshops
- Risky behaviours
- Unsafe sexual activity
- Forced marriage/Honour based violence
- Female Genital Mutilation
- Use of manipulation or coercion into unsafe practices or risky situations
- Other issues that pose a risk to children and vulnerable adults

### **Self Harm, Risk to Self, or Suicidal Intent or Ideation**

This is not a form of abuse but may constitute 'significant harm' or risk thereof. Cases involving self harm, or the potential for it, should be referred immediately to the Safeguarding Team. In urgent cases, the emergency services will need to be contacted in the first instance; e.g. the Police to conduct welfare checks or an ambulance in the case of suspected overdose.

### **8. Early Help and EHAT**

In some cases, where there are concerns that haven't met the threshold of 'Risk of Significant Harm' a proactive, preventative and supportive multiagency approach will be the most effective intervention. Working Together 2018 places a duty on Colleges and other agencies to contribute fully to Early Help.

Ada has embedded a new approach to the now retired Common Assessment Framework, and has renamed the 'process and form' used to gather information at an early help assessment stage – the Early Help Assessment Tool (EHAT). Neighbouring local authorities have also updated their Early Help arrangements.

There is a requirement that the College plays a full part in multiagency meetings and support for children and families electing to take part in the process. For advice and support please contact Designated Safeguarding Lead or member of the Safeguarding Team.

The Early Help Assessment (EHAT) is not intended to replace or delay any concerns around safeguarding. If you believe a student is suffering or likely to suffer Significant Harm, you should make a referral to the Safeguarding Team. The Safeguarding team will investigate your concern and, based on the threshold of need and guidance from the Early Help Team and/or Social Care, will either: escalate the case to Children/Adult Social Care; refer to Early Help; monitor and support within the college.

## 9. Dealing with disclosures and suspicions of abuse

All staff must be vigilant in matters relating to safeguarding students. Staff may find themselves having a suspicion about a student's safety or may have to deal with an actual disclosure.

College staff should be prepared to alert or raise a concern about abuse.

This means:

- Recognise signs of abuse against children and adults at risk
- Record initial information
- Report a concern, suspicion, disclosure or allegation following the College's Staff Guidelines/Reporting Procedures (see Appendix 1)
- Act on the guidance given by the Designated Safeguarding Lead or member of the Safeguarding Team
- Complete an incident referral using the CPOMS Safeguarding Referral system (Appendix 3)
- Keep the Safeguarding Team up to date with ongoing concerns

For the purposes of these procedures, a **suspicion** is considered to be based on serious concerns about an individual's wellbeing. This might include changes in an individual's behaviour (including becoming withdrawn, displaying extremes of emotion, inappropriate behaviour and language) and appearance (including bruising, marks, weight loss, generally looking unkempt).

A **disclosure** would be a situation where you are presented with an **allegation** or information which gives you reason to believe that an individual is, or is likely to be at risk of, significant harm to themselves or others.

Staff should follow current guidance to report concerns to the safeguarding team (see Appendix 1). They should not investigate concerns or allegations themselves. As an alerter, a member of staff is not being asked to verify or prove that information is true. Ada College's Safeguarding Team will provide guidance and support.

## 10. Preventing Violent Extremism

Safeguarding from radicalisation and extremism is no different from safeguarding from other forms of harm. All staff will clearly understand the pathways for vulnerable individuals and be aware of how to recognise vulnerability and mitigate the risks. The College has an action plan showing how it is mitigating risk and embedding British values of tolerance and respect through its curriculum.

Suspicions around students drifting into extremist activity might arise as a result of the following:

- Change in behaviours, e.g.: quick to anger, disengagement, fall in work standard, misogyny/poor attitude towards women, overt new religious practices
- Physical changes, e.g. changes in clothing or tattoos
- Showing sympathy for extremist causes, concerns student may possess illegal or extremist literature
- Glorifying violence
- Advocating messages similar to illegal organisations such as "Muslims Against Crusades" or other non prescribed extremist groups such as the English Defence League

Staff members will immediately report any concerns through the College's safeguarding procedures (outlined above and Appendix 1). The Safeguarding Team will follow the established process for reporting and escalating these concerns through the Single Point of Access for children and directly to the Local Authority's Prevent Coordinator for adults.

If there is a concern that a student is actually/currently engaged in terrorist activity, the College must contact the police or the anti-terrorist hotline immediately on 0800 789 321.

**The Safeguarding Team consists of:**

- Designated Safeguarding Lead (Child and Vulnerable Adult Protection)
- Deputy Designated Safeguarding Lead (Child and Vulnerable Adult Protection)
- Deputy Designated Safeguarding Lead (Child and Vulnerable Adult Protection)
- Safeguarding Officer – Apprentices

Members of the Safeguarding Team will be on site from 9.00 a.m. – 5.00 p.m. during term time.

In the event that there is a college event after 5.00 p.m or on weekends, a member of the Safeguarding Team will be contactable if there are any concerns about students at these times. The College's Designated Safeguarding Lead will ensure a defined rota is in place for this.

**The Safeguarding Team Members:**

- Provide advice and support to other staff on fulfilling their responsibilities and on issues relating to child and vulnerable adult protection
- Deal with individual cases, including alerting the relevant authority/making referrals and attending case conferences/review meetings as appropriate
- Receive training in child protection issues and inter-agency working, refreshed at least every 2 years

## 11. Information Sharing

Relevant information should always be shared with the College's Safeguarding Team

The following guidance should be used by College staff when deciding how, when, with whom and what information should be shared in a safeguarding context with other persons or agencies:

**Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018**

College staff cannot offer confidentiality to students; however, information will need to be shared only with nominated persons or agencies, if:

- a child or vulnerable adult is at risk of significant harm or of harming others
- there is information that a student under the age of 18 is being abused
- there is information that a student with a learning difficulty or disability of any age is being abused
- an individual may present a risk to children, a vulnerable adult or themselves

If a member of staff finds themselves in a 'disclosure' situation with a student they should inform the student as soon as possible that they have a duty to follow College procedures and inform an appropriate person.

- If at any time a member of staff is unsure of who they can share confidential information with, they should discuss this with the Safeguarding Team.
- Ada College keeps information about staff, learners and other parties to allow it to operate as a successful organisation and meet its legal obligations. To comply with the Data Protection Act 1998 ("the Act), information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, the College must comply with the Data Protection principles outlined in the Act.
- Where there are concerns that a child or vulnerable adult is, or may be, at risk of significant harm, their needs must always come first. The priority must always be to protect the child or vulnerable adults

## 12. Record Keeping

Ada College will:

- Keep clear, detailed, written records of concerns about children, young people or vulnerable adults (noting the date, event and action taken) even where there is no need to refer the matter to Children's or Adult's Social Care (where applicable)
- Ensure all records clearly indicate statements of fact, opinion and second or third hand information
- Ensure all electronic records are kept secure using the CPOMS system and any paper based records locked locations

Ada College will keep all safeguarding records, including those for vulnerable adults, as advised by the guidelines above.

### **13. Liaison with other Agencies**

The College will work to develop effective links with other services and agencies and co-operate as required with their enquiries regarding child and vulnerable adult protection matters. This includes attendance at case conferences, core groups, strategy meetings, review conferences and the submission of written reports where required.

### **14. Wellbeing and Safeguarding Strategic Leadership**

The college Leadership Team will address management, direction, auditing, scrutiny and quality improvement of safeguarding, the Every Child Matters theme of Staying Safe, the common inspection framework themes of Feeling Safe and Safeguarding.

### **15. Safeguarding Operations Group**

The Safeguarding Team meets termly, and invites staff members with an expertise or interest in this area of work to discuss operational issues and points arising from individual cases. This is then fed back to the college Leadership Team.

### **16. Safer Recruitment of Staff**

Ada College is committed to safeguarding and promoting the welfare of children and adults at risk and expects all staff, sub contractors and volunteers to share this commitment.

The Recruitment and Selection procedure is designed to assist managers to recruit and select the best candidates for a vacancy and takes account of all relevant legislation including the Safeguarding Children and Safer Recruitment in Education Guidance 2007 and Keeping Children Safe in Education 2018. The Recruitment and Selection procedure will be regularly updated as vetting and barring arrangements develop in order to ensure the College not only meets its legal duties but goes beyond compliance whenever possible to reduce the risk of harm. At least one person on any appointment panel will have undertaken safer recruitment training as advised by the LSCB.

The following members of staff have undertaken Safer Recruitment training: Adam Rogers, Tom Fogden

The following members of the College Board have undertaken Safer Recruitment training: TBA

### **Staff working in the college**

Regular training and briefings are delivered to staff groups. These vary from written briefings to interactive and online training sessions depending on the roles and responsibilities of staff. All new staff are required to read and understand the policy and Part 1 of Keeping Children Safe in Education as well as attending safeguarding training as part of their induction when joining the college.

## **Single Central Record**

The college maintains a Single Central Record of recruitment and vetting checks. This was set out in the original publication 'Safeguarding Children and Safer Recruitment in Education (2007)' and updated in the DfE's September 2018 statutory guidance. The details of all staff and regular visitors or volunteers must be kept on the College's single central record to ensure that checks have been carried out.

The Single Central Record is checked termly by the Leadership Team and College Board to ensure there are no gaps in the record.

A copy of the Recruitment and Selection Policy can be found on the College intranet or provided on request. The key safeguarding related points of this document are:

- They apply to staff and volunteers who may work with children frequently or intensively
- Posts or roles are clearly defined
- The key selection criteria for the post or role are clearly identified
- Vacancies are advertised widely in order to ensure a diversity of applicants
- Recruits are required to provide documentary evidence of academic/vocational qualifications
- Agencies providing staff or volunteers who may work regularly or for prolonged periods of time directly with students aged under 18 are required to verify recent DBS (Disclosure and Barring Service) clearance
- The Human Resource section requires suitable professional references before an appointment can be confirmed
- The selection procedure includes verification of previous employment history
- DBS disclosure/List 99 checks are carried out on successful interviewees
- The selection procedure includes a variety of selection techniques (e.g. qualifications, previous experience, interview, reference checks)

## **17. Monitoring**

A termly update will be given to the Leadership Team and the College Board detailing the number and nature of interventions.

An annual report will be submitted to the above that will provide:

- an overview of the cases and interventions for the previous year
- a summary of staff development activities and attendance at events
- a summary of activities which promote safeguarding themes to students and raise their awareness
- key safeguarding-related developments for the previous year

## **18. Principal and Governors**

The governing body will receive termly updates from the Safeguarding Strategic Lead which record cases, outcomes and key developments.

The College Board takes shared responsibility for child protection issues. The College Board is responsible for liaising with the Leadership Team and Designated Safeguarding Leads to ensure

that the College has procedures and policies that are consistent with the requirements of the Local Safeguarding Boards. Policies and procedures are reviewed annually.

The College Board is responsible for overseeing the liaison between agencies such as the police and the LSCB or LSAB in connection with allegations against the CEO, Dean or Principal. The College Board will not undertake any form of investigation, but will ensure that good communication exists between parties and will provide information to assist enquiries.

### **19. Dealing with Allegations made about a Member of Staff**

The procedures apply to all college employed staff, whether teaching, administrative, management or support, as well as to volunteers and members of Shared Services. The word “staff” is used for ease of description.

Arrangements are in place to ensure that agencies holding college contracts whose staff come into regular contact with children/vulnerable adults adopt DBS checks and provide their staff with the college briefing on Safeguarding Children and Vulnerable Adults. External agencies whose staff provide support to college students with learning difficulties and/or disabilities are required to provide written confirmation that their staff are DBS-cleared.

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

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

In appropriate circumstances the college will offer support to an employee to ensure that as far as possible their health and wellbeing is maintained. This may include referral to a specialist service if necessary.

#### **Receiving an allegation**

A member of staff who receives an allegation about another member of staff should report the allegation immediately to a member of the Safeguarding Team who will report the allegation to the HR Lead unless the HR Lead is the person against whom the allegation is made. In this case the report should be made to the Principal.

The HR Lead/their representative (or the Principal if the allegation is against the HR Lead) should:

- obtain written details (signed and dated) of the allegation from the person who received it. The written details should be countersigned and dated by the HR Lead/their representative (or the Principal)
- record information about times, dates, locations and names of potential witnesses

## **Initial assessment of the allegation**

The HR Lead/their representative (or Principal) should make an initial assessment of the allegation, consulting with the Designated Safeguarding Lead. Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the LSCB.

It is important that the HR Lead/their representative (or Principal) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the college disciplinary and dismissal procedures
- The allegation can be shown to be false because the facts alleged could not possibly be true

## **Enquiries and investigations**

Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by the College. The College may be able to use the outcome of external agencies' enquiries as part of its own procedures. The child protection agencies, including the police, will not usually have powers to direct the College to act in a particular way; however, the College will assist the agencies with their enquiries.

The College shall, except in cases where the offences have been admitted, hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary and dismissal procedures.

If there is an investigation by an external agency, for example the Police, the HR Lead/their representative (or Principal) will normally be involved in, and contribute to, the inter-agency strategy discussions. The HR Lead/their representative (or Principal) is responsible for ensuring that the college gives every assistance to the agency's enquiries. She/he will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The HR Lead/their representative (or Principal) shall advise the member of staff that he/she should consult with a representative; for example, a trade union.

Subject to objections from the police or other investigating agency, the HR Lead/their representative (or Principal) shall:

- inform the child/adult at risk or parent/carer making the allegation that the investigation is taking place and what the likely process will involve. If the young person is aged 16 or younger (i.e. statutory college age) the contact will be made with the young person's sponsor, not the parent/carer, in line with Children's Services' procedure.

- ensure that the parents/carers or sponsor of the child/adult at risk making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve unless to do so would potentially jeopardise any investigation.
- inform the Chair of Governors and/or the designated governor of the allegation and the investigation.

The HR Lead/their representative shall keep a written record of the action taken in connection with the allegation.

The Designated Safeguarding Lead shall be informed when an allegation has been received and will be told the outcome of the investigation.

### **Suspension of Staff and the Disciplinary Investigation**

The suspension of staff shall be conducted in accordance with the college's disciplinary and dismissal procedures.

### **Allegations without Foundation**

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Safeguarding Children Board/Children's Services in order that other agencies may act upon the information. This is compliant with the Data Protection Act and consistent with the recommendations included in the Bichard Report 2004. It supersedes the usual requirements under the College Disciplinary and Dismissal Policy.

In consultation with the designated senior member of staff, the Principal shall:

- inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support
- inform the parents/carers or sponsor of the alleged victim that the allegation has been made and of the outcome
- where the allegation was made by a child/adult at risk other than the alleged victim, consideration to be given to informing the parents/carers or sponsor of that child/adult at risk
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation, confirming that the above action has been taken

## **Records**

Documents relating to an investigation will be retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained. This is compliant with the Data Protection Act and supersedes the usual requirements under the College Disciplinary and Dismissal Policy and is consistent with the recommendations contained in the Bichard Report.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the Secretary of State for Education.

## **Monitoring Effectiveness**

Where an allegation has been made against a member of staff, the College Board, together with the senior staff member with lead responsibility will, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the College's procedures and/or policies, and/or which should be drawn to the attention of the LSCB. Consideration will also be given to the training needs of staff.

## **20. Implementation, Dissemination and Review**

This policy is reviewed annually by the Safeguarding Team and ratified by the CEO and College Board. All staff read and agree to the policy during their induction. At this time they also read and sign 'Keeping Children Safe in Education Part 1'. Families and students are encouraged to be familiar with this policy via the College website. Copies of this policy and its associated documents are available from the College office.

**Any member of staff who feels that an amendment needs to be made to the College's Safeguarding Policy, Guidance or the related Procedures, must inform the Designated Safeguarding Lead in writing immediately.**

## Appendix 1

### Safeguarding Children and Vulnerable Adults Staff Guidelines/Reporting Procedures

Follow this process if you believe a child/vulnerable adult is at risk of harm, if a disclosure about abuse is made to you by or concerning a child or an adult at risk, or you have concerns that a student is being drawn into extremism or radicalisation

#### **1) Alert the Safeguarding Team Member on Duty**

**9.00 -5.00 p.m. term time**

Find the Safeguarding Team Member on duty in person/on the phone immediately and report your concern. This takes priority over any other activity, including teaching.

#### **At college events after 5.00 p.m. or on weekends**

Contact the Duty Safeguarding Team member on the phone immediately. If unsure of the relevant person then refer to Safeguarding notice board

#### **2) Submit a written record of your concern to the Safeguarding Team using the Safeguarding CPOMS Incident Referral (Appendix 3)**

This needs to be done immediately after speaking to the Duty Safeguarding Team Member



#### **When speaking to a child or vulnerable adult:**

<b>Do</b>	<b>Don't</b>
<ul style="list-style-type: none"><li>• Be honest about your position, who you have to tell and why</li><li>• Listen carefully to the allegations the student is making, asking the student to clarify anything you do not understand</li><li>• Reassure the student that they haven't done anything wrong and it is not their fault</li><li>• Keep the student fully informed about what you are doing and what is happening throughout the process</li><li>• Maintain professional boundaries with students at all times</li><li>• Keep yourself safe</li></ul>	<ul style="list-style-type: none"><li>• Promise confidentiality or discuss with others except on a need to know basis.</li><li>• Ask leading questions (e.g. did your mother do this to you?)</li><li>• Press the student for any more information than they are willing to give</li><li>• Make promises (e.g. this will never happen again)</li><li>• Have a relationship with a student as it is a breach of trust. If a student is under 18 and the relationship is sexual, irrespective of consent you will be dismissed and reported to the police as it is a criminal offence under the Sexual Offences Act 2003</li><li>• Give your personal email/mobile/social networking details to students</li><li>• Reply to emails from students late at night or at the weekend</li><li>• Take a student home</li></ul>

**Please do not offer a place to anyone where it is known that they have a criminal record for a violent or sexual offence without first contacting the safeguarding lead**

## Appendix 2

### Procedures for Duty Safeguarding Team Members

When an allegation of abuse is made by a child or a vulnerable adult to a member of staff or they have a suspicion about a student's safety they must contact the Duty Safeguarding Team Member immediately. This contact must be done in person or on the phone so that the staff member has confirmation that the Duty Safeguarding Team Member has made aware of the concern.

Reporting a concern takes priority over any other activity, including teaching.

The Duty Safeguarding Team Member must ensure that the matter is addressed immediately. If the Duty Safeguarding Team Member is unable to undertake their designated session they must contact the Designated Safeguarding Lead (or representative).

See Part 4 for definitions of a child, vulnerable adult/adult at risk and categories of abuse or harm.

When a Duty Safeguarding Team Member is contacted by a member of staff they should:

- Ask the member of staff what the situation is and what their concerns are.
- Confirm that the member of staff has followed appropriate guidance – see Appendix 1
- Talk to the student/subject of concern if appropriate (or direct another member of staff to do so)
- Make a judgement and give advice and guidance to staff
- Take appropriate action as necessary to keep the subject safe; e.g. ring Children Services/Adult Services or emergency services (contact numbers will be updated on the online Safeguarding Training Area). They must submit a referral the same day through the Single Point of Access if the case meets the threshold and need for this (They may speak to a social worker at Children/Adult Services for guidance if needed)
- Organise a taxi if needed by ringing the College's taxi account.
- Ask the member of staff to submit a written record of their concern to the Safeguarding Team using the CPOMS Safeguarding Incident Referral immediately after speaking to them
- Remind staff on how to accurately and factually record the allegation or suspicion (e.g. don't give own opinion)
- Ensure the concern is tracked in the CPOMS system, updating details of actions taken, advice given and reasons why. Ensure that any physical evidence (e.g. written statements) are filed in the student's safeguarding file and attached to the incident referral. If referrals are made to any services (e.g. Early Help, Social Care, CAMHS) then these referrals need to also be logged on CPOMS.
- Continue appropriate liaison and take appropriate additional actions in order to reduce the risk of significant harm

## Appendix 3

### Safeguarding Referrals

- Staff will log any incidents on our CPOMS system as it allows for:
  - Audit Trails
  - Action Management and auto alerts
  - Data security
  - Ease of use for input and reporting
  - Monitoring and tracking of specific incidents
- All staff are trained on how to use the system as part of their induction. A user guide can also be found here:
  - <http://www.cpoms.co.uk/restrictedsystemaccess/>
- The incident logging page can be seen below. Staff are asked to complete as many of the sections as possible when logging an incident, as noted previously.

The screenshot shows the CPOMS incident logging interface for a student named Hannah Greenwood (1B). The form is divided into several sections:

- Incident description:** A large text area for entering the details of the incident.
- Categories:** A dropdown menu for selecting the type of incident.
- Linked Students:** A dropdown menu for selecting other students involved in the incident.
- Date and time of incident:** A date and time picker.
- Files to add:** A section for uploading files such as malicious emails, pictures, or notes.
- Alert Staff Members:** A section for selecting staff members to be alerted.
- External Agencies:** A section for selecting external agencies like Councils or CAMHS.

A 'Save Incident' button is highlighted at the bottom of the form.

- Designated and deputy designated safeguarding leads have access to incidents logged on the system and are able to track and monitor this. Each case is reviewed by the Designated Safeguarding Lead as the incident is logged and a decision made regarding actions to take.
- Actions can be assigned to individuals using the system and they are then alerted of this.

## **Appendix 4**

### **Safeguarding Children, Young People and Vulnerable Adults:**

#### **Code of Practice for members of the Student Counselling Team**

This code of practice has been developed in response to professional counselling practice guidance and meets the requirements of the law. It forms part of the "Safeguarding" policies (for Children and Young People and for Vulnerable Adults). It applies to those staff and volunteers who work as members of the Student Counselling Service.

1. In the course of their work with clients, counsellors will encounter disclosures of past or present abuse, or learn that a third party is being or is in danger of being abused. Although counsellors do have the freedom to use their professional judgement, such situations highlight a conflict between two key principles.
  - 1.1.1 The counsellor and the college hold a responsibility of care. In recognition of this responsibility, the college is obliged to formulate a policy and a set of procedures for reporting abuse of young people aged under 18.
  - 1.1.2 There is a fiduciary relationship between the counsellor and her/his client, which may be compromised by the automatic reporting of suspected abuse to the College's designated lead manager for the protection of children, young people and vulnerable adults. This relationship is recognised in law (see footnote\*) and its nature and limits are guided by the Code of Ethics and Practice for Counsellors of the British Association for Counselling and Psychotherapy (BACP).
2. The procedure which should be followed by counsellors in such a situation is as follows:
  - 2.1 The counsellor must keep a record of the disclosures made by their client.
  - 2.2 If the disclosure does not, in their judgement, require immediate referral to the designated lead manager for the protection of children, young people and vulnerable adults, but nevertheless causes the counsellor concerns, she/he must discuss the issue promptly without giving name and details with the designated lead manager or their clinical supervisor. Any decisions and agreed actions should be recorded by the counsellor.
  - 2.3 If after raising the matter with the third party, a counsellor continues to have concerns, she/he is advised to raise these concerns promptly with the designated lead manager.
  - 2.4 The Counselling and Wellbeing Manager (or her nominee) will inform the college's designated lead manager (or his nominee) when such cases arise so that the number of cases and their progress can be monitored.