



**Children and Vulnerable Adults
Safeguarding Policy October 2014**

Children and Vulnerable Adults Safeguarding Policy

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Glossary of Terms

DSO	-	Designated Safeguarding Officer
ESCB	-	Essex Safeguarding Children Board
ESAB	-	Essex Safeguarding Adult Board
LEA	-	Local Education Authority
UTC	-	University Technical College

A General Policy Statement and Definitions

- A.1 Harlow College has a statutory duty to ensure that the college adheres fully to its safeguarding responsibilities and promotes the welfare of children/vulnerable adults receiving education and training at the college. This policy applies to all students, apprentices, staff, governors, employers, volunteers and visitors at the college.
- A.2 Throughout these policies and procedures, reference is made to “children”. This term is used to mean “those under the age of 18”. However, the governing body recognises that some vulnerable adults are also open to abuse and this policy also covers those adults. A ‘vulnerable adult’ is any person aged 18 or over who ‘is or may be in need of community care services by reason of mental or disability, age or illness’ and ‘who is or may be unable to take care for him or herself, or unable to protect him or herself against significant harm or exploitation’. (Department of Health, 2000). People whose learning difficulties make it difficult for them to protect themselves from harm also come within this definition. This policy and its procedures have been developed to be pro-active in responding to Child and Vulnerable Adults Safeguarding Legislation and should be read in conjunction with the Public Interest Disclosure Policy, Guidelines for Staff on Avoiding False Accusations, Staff Disciplinary Procedure, Student Disciplinary Procedure and Anti Bullying Policy.
- A.3 Safeguarding is a term used to denote the duties and responsibilities that those providing a health, social or education service have to carry out to protect individuals from harm. Specifically, the DfES (2006) stated that the objective of safeguarding is to provide a safe environment in which to learn and to identify those suffering or likely to suffer significant harm; it is then to take appropriate action to ensure those children/vulnerable adults are kept safe, both at home and in the educational setting.
- A.4 The governing body is committed to ensuring that the college:
- A.4.1 Provides a safe environment in which children/vulnerable adults can learn
 - A.4.2 Endeavours to identify children/vulnerable adults who are suffering, or likely to suffer, significant harm, and
 - A.4.3 Takes appropriate action to see that such children/vulnerable adults are kept safe, both outside and within the college campus
- A.5 In pursuit of these aims, the governing body will approve and annually review policies and procedures with the aim of:
- A.5.1 Raising awareness of issues relating to the welfare of children/vulnerable adults and the promotion of a safe environment for the children/vulnerable adults learning within the college
 - A.5.2 Aiding the identification of children/vulnerable adults at risk of significant harm, and providing procedures for reporting concerns
 - A.5.3 Establishing procedures for reporting and dealing with allegations of abuse against members of staff
 - A.5.4 The safe recruitment of staff
- A.6 In developing the policies and procedures, the college will consult with, and take account of, guidance issued by the relevant government departments and other relevant bodies. Procedures will be developed in co-operation with the Essex Safeguarding Children Board and the Essex Safeguarding Adult Board.
- A.7 The college will refer to Social Services concerns that a child/vulnerable adult might be at risk of significant harm.
- A.8 The governing body has nominated a governor with special responsibility for child/vulnerable adult safeguarding issues. Who will undertake appropriate training when required.

- A.9 The Principal and all staff will receive training at level 1 adequate to familiarise them with child/vulnerable adult safeguarding issues and responsibilities and the college procedures and policies, with refresher training at least every 3 years. There will be a senior member of the college management team with special responsibility for child/vulnerable adult safeguarding issues who will have the role of Designated Safeguarding Officer (DSO). He/she shall be assisted by members of the Safeguarding Team.
- A.10 The governing body will receive from the DSO an annual report which reviews how the duties have been discharged.
- A.11 Additionally, the governing body will ensure that the college makes staff aware of criminal offences that could be committed in connection with the welfare of children/vulnerable adults; in particular those involving abuse of trust which prohibits staff from engaging in or encouraging sexual activity with students who are under the age of 18 or vulnerable adults (these are codified in the Sexual Offences Act 2003 Sections 16-24 where the primary purpose of the abuse of trust provisions is to provide protection for young people aged 16 and 17 and vulnerable adults who are considered to be particularly vulnerable to exploitation by those who hold a position of trust or authority in their lives).

A.12 **Duty of Confidence**

Information held by an agency is subject to the legal “duty of confidence” and should not normally be disclosed without the consent of the persons who have provided the information or are the subject of the information. However, the public interest in maintaining confidentiality can be overridden by the public interest to protect vulnerable persons. (Refer to Harlow College Public Interest Disclosure Policy and Procedures (whistleblowing), Annex 3 and Harlow College Data Protection Policy Annex 5.)

Disclosure without consent must therefore be necessary and justifiable in each case and the information disclosed must be the minimum necessary to achieve the aim. The DSO will be responsible for obtaining legal advice in these circumstances, but due regard must be made to the fact that this may cause unnecessary delay and potential additional implications. Where any agency discloses information without consent, it is responsible for ensuring that such action complies with the Data Protection Act 1998, Human Rights Act 1998 and any other legislation or guidance which is applicable to individual agencies. Annex 5 Harlow College Data Protection Policy.

B Designated Staff with Responsibility for Safeguarding

B.1 Designated Safeguarding Officer (DSO)

The college will appoint a designated senior member of staff with lead responsibility for child/vulnerable adults. They will be assisted in this responsibility by the Safeguarding Team (see Appendix 6 – “What to do chart”).

The DSO has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children/vulnerable adults, primarily through the promotion of a safe environment for people learning at the college.

The DSO and the lead manager of the Safeguarding Team are trained to Level 3 in child/vulnerable protection issues and inter-agency working, as required by the Essex Safeguarding Children Board (ESCB) and will receive refresher training at least every 2 years. They will keep up to date with developments in child/vulnerable adult safeguarding issues.

The DSO is responsible for:

- B.1.1 Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies
- B.1.2 Providing advice and support to other staff on issues relating to child/vulnerable adult protection
- B.1.3 Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even where that concern does not lead to a referral)
- B.1.4 Ensuring that parents/carers of children and carers of vulnerable adults within the college are aware of the college's safeguarding procedures
- B.1.5 Liaising with the LEA, ESCB, ESAB and other appropriate agencies both on and off the Harlow College Campus, including the UTC.
- B.1.6 Ensuring there is liaison with secondary schools and other educational and training providers and employers which send learners to the college, to ensure that appropriate arrangements are made for the learners
- B.1.7 Ensuring that staff receive basic training in child/ vulnerable adult safeguarding issues in line with paragraph A.9 of the General Policy Statement and are aware of the college child/vulnerable adult safeguarding procedures.
- B.1.8 Providing an annual report to the governing body of the college setting out how the college has discharged its duties.
- B.1.9 Reporting deficiencies in procedure or policy identified to the governing body at the earliest opportunity.
- B.1.10 Chairing the Safeguarding Steering Group which meets three times a year and is responsible for strategic safeguarding decisions. The Steering group consists of the DSO, Designated Safeguarding Governor, Head of HR Services, Director of Facilities, Student Safeguarding Manager and a student representative.

B.2 Designated Safeguarding Group Staff Members

Other designated members of staff with responsibility for child/vulnerable adult safeguarding issues are members of the College Safeguarding Team and managers with a responsibility for work-based learning (off site provision) where they have a duty to ensure that employers/partners are compliant with safeguarding legislation.

These designated staff members:

- B.2.1 Will report to the DSO
- B.2.2 Will know how to make an appropriate referral
- B.2.3 Will be available to provide advice and support to other staff on issues relating to child/vulnerable adult protection
- B.2.4 Have particular responsibility to be available to listen to children/vulnerable adults studying at the college
- B.2.5 Will deal with individual cases, including attending case conferences and review meetings as required by the DSO
- B.2.6 Have received training to level 2 in child/vulnerable adult protection issues and inter-agency working, and will receive refresher training at least every 3 years
- B.2.7 The designated safeguarding group meet 5 times a year under the chairmanship of the Student Safeguarding Manager to discuss operational safeguarding issues. Student representatives are invited to these meetings.

B.3 Designated Governor

The governing body will designate a governor with responsibility for child/vulnerable adult protection issues.

The designated governor is responsible for liaising with the Principal and the DSO over matters regarding child/vulnerable adult safeguarding, including:

- B.3.1 Ensuring that the college has procedures and policies which are consistent with the Essex Safeguarding Children's Board and the Essex Safeguarding Adult Board procedures.
- B.3.2 Ensuring that the governing body considers the college policy on child/vulnerable adult safeguarding each year
- B.3.3 Ensuring that each year the governing body is informed of how the college and its staff have complied with the policy, including but not limited to a report on the training that staff have undertaken. The designated governor may also be a key link in the liaison between agencies such as the police or Social Services in connection with allegations against the Principal or the DSO. This will not involve undertaking any form of investigation and the Designated Governor therefore will not be given details relating to individual child/vulnerable adult protection cases or situations to ensure confidentiality is not breached.

C Implementation of the Disclosure and Barring Scheme for staff

The college has effective recruitment and selection procedures, with regard to safeguarding (see separate procedure):

- C.1 All staff are subject to a Disclosure and Barring check
- C.2 Safeguarding training (Level 1) is a mandatory part of the induction programme for all new staff
- C.3 Procedures apply to all staff and volunteers who may work with children/vulnerable adults
- C.4 Responsibilities for safeguarding are clearly defined in role profile
- C.5 Members of staff who need to be investigated following an alleged breach of care in respect to safeguarding are dealt with through the Staff Disciplinary Procedures and contacting the relevant Children or Adult Safeguarding Service.

D Whistleblowing

D.1 The college has a Public Interest Disclosure Policy and Procedure where staff are made aware of their duty to raise concerns about the attitude or actions of their colleagues. If necessary staff should speak to the nominated Designated Safeguarding Governor or a Designated Safeguarding Officer if they have safeguarding concerns with colleagues.

Appendix 1: Definition of Abuse

'Abuse' is a violation of an individual's human and civil rights by any other person or persons. It may involve a single or repeated act or omission, occurring within a personal or other close relationship where there is an expectation of trust, which causes harm to a vulnerable person. Abuse can be intentional or unintentional. It can be active or passive, and it may be part of a pattern of behaviour or a single incident.

The following examples of abuse are not exhaustive:

Physical Abuse

- Hitting, slapping, pushing, kicking, throwing, shaking, inappropriate/careless handling and other forms of assault that may not leave visible signs of injury, but may cause pain or discomfort
- Beating (with or without an implement), punching, biting, deliberate burns, scalding, unnecessary restraint and other forms of assault that leave injuries
- Stabbing, strangulation, drowning, poisoning and wounding (breaking the skin) and other forms of assault that cause serious injuries or death
- Medical mistreatment such as withholding or inappropriately altering or administering medication or other treatments, and the inappropriate use of restraint or other sanction.

Sexual Abuse or Exploitation

Sexual abuse involves a child/vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the person to be aware that the activity is sexual and the apparent consent of the person is irrelevant.

- Incest, rape
- Offensive or suggestive sexual language or behave in a sexually inappropriate way
- Touching, fondling, caressing, kissing, masturbation
- Oral sex on alleged victim, oral sex by alleged victim on perpetrator
- Sexual intercourse
- Involvement in prostitution or pornography
- Watching sexual activities

Psychological/Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause severe and adverse effects on the child/vulnerable adult's behaviour and emotional development, resulting in low self worth.

- Use of threats or fears to over-ride a person's wishes
- Lack of privacy or choice
- Denial of dignity

- Deprivation of social contact or deliberate isolation
- Being made to feel worthless
- Threat(s) to withdraw care or support or contact with friends
- Humiliation, blaming
- Use of coercion
- Treating an adult as if they were a child
- Verbal abuse
- Exploitation or corruption
- Always feeling frightened or in danger

Neglect and Acts of Omission

Neglect is the persistent or severe failure to meet a child/vulnerable adult's basic physical and/or psychological needs likely to result in serious impairment of the person's health or development.

- Lack of care
- Withholding food, drink, medication or shelter
- Deprivation of necessary personal care
- Failure to protect from harm
- Removal of aids to daily living
- Failure to give access to health and social care or educational services
- Failure to give information about sexual and reproductive health

VULNERABLE ADULTS have 2 additional categories of abuse, but these could apply equally to our 16-18 students.

Financial Abuse or Exploitation

- Stealing, theft of money or property
- Deceiving or manipulating a person out of money or property
- Withholding or misusing money or property
- Stripping the person of his or her assets
- Exploitation of dependence for personal gain
- Misuse of benefits by others

Discriminatory Abuse

- Racist, sexist or homophobic abuse
- Abuse relating to age, illness or disability
- Acts or comments, including incitement of others to commit abuse

Appendix 2: Staff Procedure for Dealing with Disclosures of Abuse and for Reporting Concerns

If a child/vulnerable adult tells a member of staff about possible abuse:

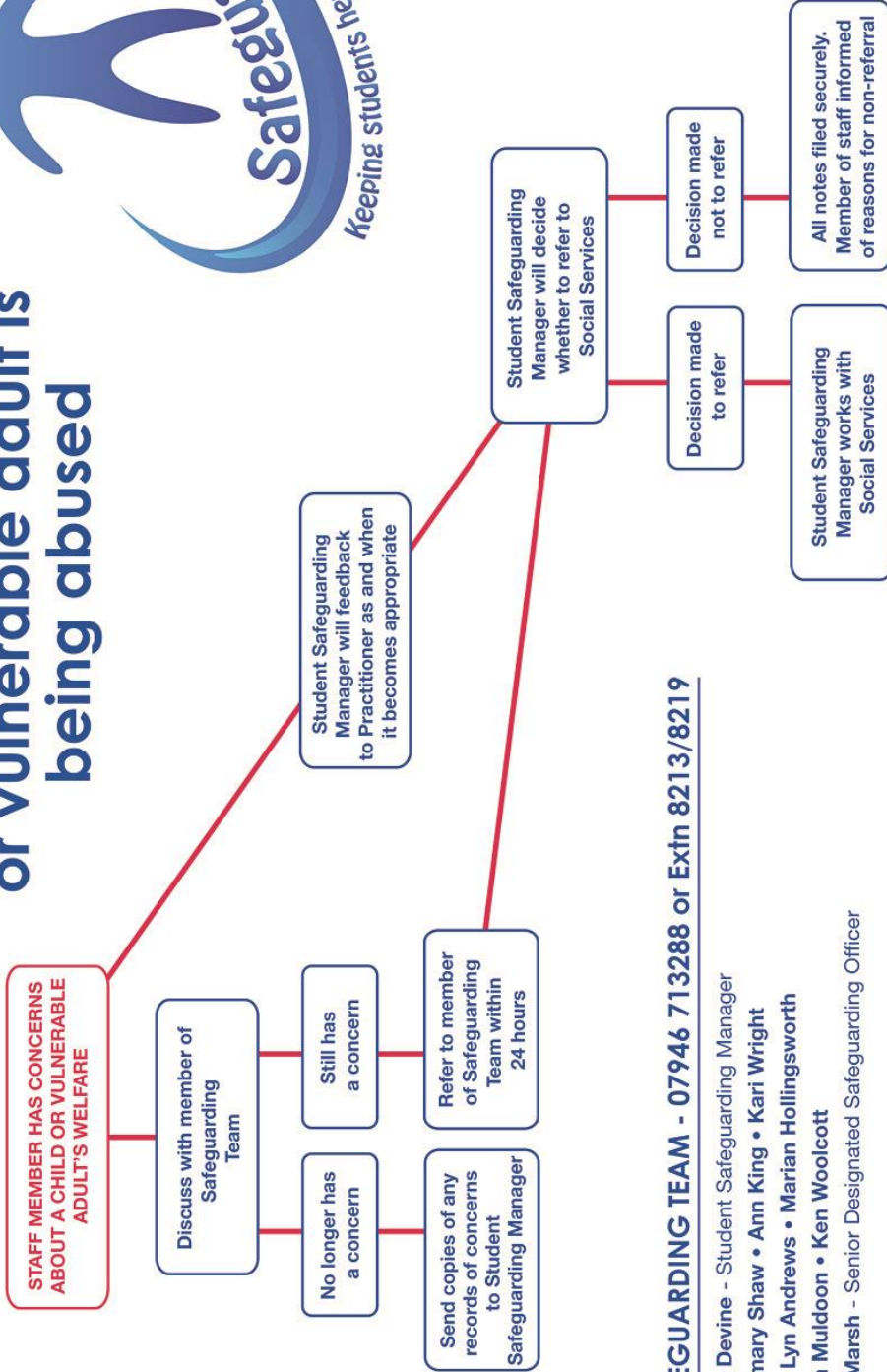
- 1 Listen carefully and stay calm.
- 2 Do not interview the child/vulnerable adult, although if necessary you may seek to clarify, using open questions and without putting words into the person's mouth, in order to be sure that you understand what the person is telling you.
- 3 Reassure the person that by telling you, they have done the right thing.
- 4 Inform the person that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- 5 Note the main points carefully.
- 6 Make a detailed note of the date, time, place, what the person said, did and your questions etc.
- 7 Staff should not investigate concerns or allegations themselves, but should report them immediately to the Safeguarding Team. The lead safeguarding manager or the DSO will make a referral in accordance with Local Safeguarding Children's Board or Local Safeguarding Adult Board guidelines.
- 8 Concerns relating to possible abuse by a member of staff must be reported immediately to a member of the safeguarding team for action.

To reiterate: your responsibility is to

1. Follow the referral flow chart 'What to do if you're worried a child/vulnerable adult is being abused' (appendix 4)
2. Ensure the safety of the vulnerable child/adult at this point. Don't send them back home into danger, keep victim and perpetrator separate if necessary
3. Provide reassurance to the child/vulnerable adult, not promise confidentiality, as you will need to pass on any information given
4. Pass on the information, not make the decision that it isn't worth taking seriously
5. Believe the person but not interview anybody yourself. If a crime has been committed this will contaminate the evidence and lose a possible prosecution
6. Preserve any evidence and record everything seen and heard
7. Follow up any verbal report with confirmation in writing
8. Be prepared to co-operate fully with any formal investigation

Appendix 3: Referral Flow Chart

WHAT TO DO
if you're worried a child
or vulnerable adult is
being abused



SAFEGUARDING TEAM - 07946 713288 or Extn 8213/8219

- Steve Devine - Student Safeguarding Manager
- Rosemary Shaw • Ann King • Kari Wright
- Tracy Lyn Andrews • Marian Hollingsworth
- Caron Muldoon • Ken Woolcott
- Paul Marsh - Senior Designated Safeguarding Officer

Appendix 4: Do You Feel Safe Poster

**HARLOW
COLLEGE**

DO YOU FEEL SAFE?



You have the right to be and feel safe from



PHYSICAL ABUSE

No one should touch you in any way that physically hurts. This could include hitting, pushing, slapping, kicking or holding you back.



BULLYING

No one should make you feel scared. They should not make you do anything that you do not want to do, either in person or electronically (e.g. text, email, web etc).



SEXUAL ABUSE

No one should touch you in a manner that makes you feel uncomfortable or upset. No one should make suggestive, sexual remarks to you.



DISCRIMINATION

No one should be treated badly because of difference in age, disability, gender, ethnicity, or religion. Difference should be respected.



EMOTIONAL ABUSE

No one should upset your feelings by taunting or teasing, either in person or electronically (e.g. text, email, web etc).



NEGLECT

Whoever looks after you should not neglect you. You should know that you are cared for.

WE CAN HELP

Safeguarding Team

Steve Devine · Marian Hollingsworth
Ann King · Tracy Lyn Andrews
Rosemary Shaw · Kari Wright
Ken Woolcott · Caron Muldoon

Come to iZone or ask at Reception for Safeguarding or call us on **07946 713288** or **01279 868219**

email: safe@harlow-college.ac.uk

You can do this directly or via the confidential e-mail button on Qube

You can also text **BESAFE** followed by a space, then your message to **07950 080613**. Don't forget to include your name and the issue(s) you're concerned about.

Students in the workplace - contact your supervisor or tutor.

Confidentiality policy

We will always treat any information you share with us as confidential. However, if you tell us that you or someone else is being abused or is in danger, we have a duty of care and must take further action.

Updated Sept 2014 • Review Aug 2015

APPENDIX 5

PREVENT Procedure: Detecting and Preventing Radicalisation and Extremism

Background

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to prevent the radicalisation of people and to stop people moving from extremism into terrorist-related activity.

Context

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. As an organisation that interacts with young people Harlow College ensures that staff and students are aware of these risks and are familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

The College Procedure

The College has developed internal support mechanisms and referral procedures. This procedure outlines who staff and students should contact with any concerns about fellow staff or students. The College has developed links with external agencies that provide training and support. If, once internal processes are completed, it is considered that additional external support or referral is required, this will be arranged via the Safeguarding Team or the designated member of the Executive team, whichever is most appropriate. External support will normally involve an individual being asked to voluntarily receive tailored support from appropriate external individuals or organisations.

Definition of Radicalisation

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence”. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination
- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies and/or faiths

Who are we safeguarding?

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure
- Indoctrination

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing vulnerable individuals in.

This raises the question of what will those signs of radicalisation look like? They will often look a lot like troubling behaviour:

Emotional – angry, mood swings, new found arrogance, perceived sense of injustice, sense that other people are “wrong”

Verbal – expressing opinions that are at odds with generally shared values, , language, phrases and ways of speaking/writing not previously seen/known.

Physical – appearance (tattoos), change in routine, dress, new obsessions and pre-occupations

What to do if you believe someone to be at risk of radicalisation

The College will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable. This is the ethos promoted by Essex Police Prevent team.

Notice – Recognition of any changes in behaviour or appearance similar to those outlined above

Check – Speak with someone you trust (like a tutor/colleague) and see what they recommend but trust your instinct if you are still concerned

Share – Speak to one of the safeguarding officers to report your concerns. Remember –trust your instinct

If you are a student and concerned about another student, please **Check** with your tutor in the first instance and **Share** with the Safeguarding Team.

If you are a student and are concerned about a member of staff, or a person who is not a member of the College, e.g. guest speakers, please **Check** with the Safeguarding Team and **Share** with the Student Safeguarding Manager or the Executive Director Human Resources.

If you are a member of staff and are concerned about a student, please **Check** and **Share** with the Safeguarding Team or your line manager.

If you are a member of staff and are concerned about another member of staff please **Check** with your Line Manager and **Share** with the Executive Director of Human Resources.

If you are a member of staff and are concerned about a person who is not a member of the College, e.g. a guest speaker, please **Check** and **Share** with the AP Student Services.

Responsibility for contacting PREVENT

Any of the following people are responsible for making decisions to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a student:

- Student Safeguarding Manager
- Director of Learner Development and Support
- Designated Safeguarding Officer (DSO)

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a member of staff:

- Executive Director Human Resources
- DSO

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Essex Police if serious concerns are raised about a person who is not a member of the College, e.g. a guest speaker:

- Executive Director Human Resources
- DSO

NB. As outlined in Keeping Children Safe in Education (April 2014), anyone has the right to refer to Social Care regarding any concerns for an individual. The College gives this right with regards to extremism and anyone can report a concern to Essex Police by dialling 101. Where this does occur, please inform the Safeguarding Team with regards to a student or member of the public who visits the College and the Executive Director Human Resources with regards to a member of staff.

Press Releases

In the event we are alerted to the fact that a student has been radicalised and actively working with an extremist/terrorist group then we will make sure that we communicate with the press and stakeholders at the earliest convenience. The College takes the position that it is best to work with the stakeholders to inform them of any instances before press releases where possible. If any Governor or staff member are approached by press or other agencies they should refer all items to the Head of Marketing, who is responsible for drafting and managing any communication, and who in turn will alert the Principalship.

TRACKING and REFERENCE INFORMATION

Date Approved: August 2013 (reviewed 22 October 2014)

Review Date: Annually

Author/Responsibility: Paul Marsh

Equality Impact Assessment: 20th January 2014

Date Agreed by Unions and/or Other Staff Representatives (if applicable): N/A

List of related policies, procedures and other documents:

Complaints Procedure
Equality & Diversity Policy
Equality and Diversity Scheme
Student Disciplinary Policy & Procedure
Staff Disciplinary Policy & Procedure
Grievance Procedure
Data Protection Policy

Complaints: If you wish to submit a complaint about the application of this policy or the procedure of it, please send your request in accordance with the provisions of the Grievance Procedure.

Monitoring: The application of this policy and associated procedure will be monitored by HR Services

Easy reading: To receive this policy/procedure in a different format, please contact HR Services