

SAFEGUARDING & PREVENT POLICY & PROCEDURE

Purpose and Scope

Purpose

This policy is designed to provide guidance for members of staff to ensure that EMD acts in the best interests of vulnerable groups, including children and ensure they take all reasonable steps to prevent harm to themselves and others.

The implementation of EMD's safeguarding and Prevent policy protects and promotes the welfare of staff and learners and enhances the confidence of stakeholders, staff, volunteers, parents/carers and the general public.

EMD will establish, maintain and regularly review the Safeguarding & Prevent Policy.

Scope

All learners enrolled at EMD, all staff, visitors, managers, volunteers and external speakers will be covered by this policy.

Responsibility & Authority

It is the responsibility of the Director to ensure that the Safeguarding Policy is adhered to within EMD.

It is the responsibility of all staff and enrolled learners to adhere to the Safeguarding & Prevent Policy.

Policy Statement

EMD fully recognises the responsibility it has regarding safeguarding and promoting the welfare of learners.

Safeguarding is defined as:

- protecting all learners from harm
- preventing impairment of Learner's health and development
- taking action to enable all learners to have the best outcomes
- promoting a safe environment free from violence
- preventing impairment of learner's health, development and well-being

EMD's policy is to comply with the following legislation, guidance and best practice relevant to safeguarding and Prevent, including (but not limited to):

- The Safeguarding Vulnerable Groups Act (2006)
- Statement of Government Policy on Adult Safeguarding
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (2014)
- Section 26 of the Counter-terrorism and Security Act 2014
- The 2011 Prevent Strategy

The Safeguarding Act defines two groups of people that it sets out to protect:

- Children (under 18)
- Vulnerable Adults (details below)

The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as:

- those in residential accommodation provided in connection with care or nursing or in receipt of domiciliary care services
- those receiving health care
- those in lawful custody or under the supervision of a probation officer
- those receiving a welfare service of a prescribed description or direct payments from a social services authority
- those receiving services, or taking part in activities, aimed at people with disabilities or special needs because of their age or state of health
- those who need assistance in the conduct of their affairs

It is the responsibility of all members of EMD Staff to record and report concerns under this policy.

EMD is also committed to preventing unsuitable people from working (either paid or unpaid) with children or vulnerable adults. It does this by vetting all those who wish to do such work vulnerable groups and barring those where the information shows they pose a risk of harm.

Categories of Abuse

There are different categories of abuse all leaders, managers and staff need to be aware of. These are:

- Physical Abuse
- Emotional / psychological Abuse
- Sexual Abuse
- Severe neglect
- Financial / material abuse
- Discriminatory Abuse
- Exploitation (inc Radicalisation)

Possible signs of abuse

EMD has a legal duty of care for all learners we work with. Part of this duty of care is to report cases of suspected abuse. If any member of staff has concerns over a learner they work with they must report this to the designated Safeguarding / Prevent Lead.

Staff may become aware of potential abuse in three main ways:

- They may observe signs in a learner that lead to a suspicion of a form of abuse

- The learners themselves may disclose that they have been abused
- A whistleblowing claim may be made about a learner by someone who may suspect a form of abuse

There are signs to look out for when working with learners that may indicate abuse, although these signs may not directly indicate a safeguarding issue, it may help tutors or support staff identify differences in behaviours that may need some follow up action.

Physical Abuse:

- Unexplained injuries or burns (inc self- harming)
- Refusal to discuss injuries
- Improbable explanations to injuries
- Untreated injuries or lingering illnesses
- Admission of punishment which appears excessive
- Shrinking from physical contact
- Fear of returning home or of parents / guardians / spouse being contacted
- Aggression or bullying of other people
- Significant behavioural change
- Deterioration of work (which could have various explanations)
- Unexplained pattern of absences

Emotional / Psychological Abuse:

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses
- Self-harm or mutilation
- Compulsive stealing
- Drug / alcohol / solvent abuse
- 'Neurotic' or obsessive behaviour
- Social isolation (which could have various explanations)
- Desperate attention seeking (which could have various explanations)
- Eating problems (which could have various explanations)
- Depression & withdrawal (which could have various explanations)

Sexual Abuse:

- Bruises, burns or bite marks
- Sexual awareness inappropriate to the persons age
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Promiscuity, prostitution, provocative sexual behaviours
- Self-injury, suicide attempts, self-destructive behaviour

- Recoiling from physical contact
- Eating disorder (which could have various explanations)
- Changes in behaviour (which could have various explanations)
- Depression (which could have various explanations)

Severe Neglect:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at work or class
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Constant tiredness

Financial / material:

- Loss of jewellery or personal property
- Unexplained withdrawal of cash
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing

Exploitation / Radicalisation:

- Unexplained absences from work or class
- Appearing with unexplained gifts or new possessions
- New friends that are older
- Mood swings or changes in emotional well being
- Drug or alcohol misuse
- Individuals views becoming increasingly extreme
- Becoming increasingly intolerant
- Expresses desire / intent to take part in extremist activity
- Downloading, researching or viewing extremist propaganda
- Withdrawn & focused on only one ideology
- Changes in appearance, personality and becoming isolated from friends, family & local community (This needs to be addressed sensitively as it could have various explanations and could happen at different times during the year / religious celebrations)

Code of Conduct

Staff working with young people or vulnerable adults must follow the codes of conduct set out in this document and any additional set out by their own training provider.

You must NOT:

- Panic. The process and procedures are in place to support and protect you and your learner(s)
- Make any unnecessary physical contact with a young person or vulnerable adult, however if physical contact is unavoidable e.g. providing comfort at times of distress this should only take place with the consent of the learner
- Take vulnerable adults or young people alone in a car
- Meet vulnerable adults outside the work / training environment
- Engage in sexual provocative conversations or activity
- Allow the use of inappropriate language to go unchallenged
- Do things of a personal nature that the learners can do themselves
- Make promises to keep any disclosure confidential from the relevant authorities
- Show favouritism to the vulnerable adult
- Lie or say that everything will be ok when you cannot promise that
- Criticise the abuser, especially if it is a parent / carer
- Press for answers the learner is unwilling to give.

You MUST:

- Listen carefully to what is said
- Take what is said seriously and accept what is told
- Respect learners rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviours they do not like
- Act with discretion with regard to their personal situations and relationships.
- Be aware of the procedures for reporting concerns or incidents and familiarise themselves with the contact details of the safeguarding champion and local authority contacts
- Make your safeguarding champion aware of any inappropriate affection or attention from a learner to you
- Report any concerns relating to the welfare of the learner to your safeguarding champion
- Write down as soon as you can exactly what has been said – do not add in anything extra & use only the words used by the learner
- Tell the learner you must pass the information on but only those who need to know and tell them who these people are
- Comply with any requests for information from senior management or relevant external services
- Ensure the reputation of EMD is upheld.

Challenging Extremism

If students make comments which could be regarded as extremist, staff should encourage learners:

- to think critically
- to consider whether the evidence they have is accurate and full
- to consider whether they have received an partial and/or unsustainable interpretation of evidence
- to consider alternative interpretations and views.

Staff should use opportunities to challenge extremist narratives through discussion with students. If staff do not feel confident in challenging extremist ideas with their students they should ask for support from the Safeguarding officer.

If students behave in a way which contravenes the principles of equality, diversity and inclusion, then this is a disciplinary issue e.g. refusing to work with a gay student or a student of a different ethnicity and will be dealt with through the normal disciplinary process.

Sexual Violence and Harassment

Safeguarding incidents and/or behaviours can be associated with factors outside EMD, including intimate personal relationships which are a source of sexual violence and/or harassment. This will inevitably adversely affect an individual's ability to work and participate in learning.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Should a learner at EMD show signs or evidence that they themselves are a perpetrator of sexual violence or harassment, this may be a sign that they themselves have experienced, or are experiencing abuse. Disciplinary action must be taken, with safeguarding all affected individuals in mind. All learners and staff are supported and protected as appropriate.

Procedure

To fulfil our policy, EMD sets out the following:

- Recruitment processes that comply with the law and will ensure that children and vulnerable adult learners are protected
- All necessary actions to comply with current legal safeguarding requirements
- Making the necessary checks to ensure that employment that involves regular contact with young people under the age of 18 or other vulnerable learners is not offered to or held by anyone who has been convicted of certain specified offences, or whose name is included on lists of people considered unsuitable for such work held by the Department for Education and the Department of Health. Information is sought from the Disclosure and Barring Service

- Undertaking of adequate risk assessments to establish what actions are required where staff have regular contact with Learners under 18 or other vulnerable Learners.

To comply with this policy statement, EMD ensures that we conduct a risk assessment of the specific local risks in the areas we work in and consider and record mitigating actions wherever possible.

EMD also ensures that across the business, procedures are adopted to maintain the safety of all staff and learners, as follows:

Staff

- All staff are DBS checked and details held on a central single record
- All recruitment and staff induction processes are in accordance with our safe Recruitment policy
- An appointed Safeguarding & Prevent Lead and an external Safeguarding consultant is in place
- Safeguarding training is completed for all staff, including Prevent
- A Staff Safeguarding Code of Conduct to help protect staff as well as learners
- Whistleblowing and Complaints Policies and procedures take into account the safeguarding of learners and staff

External Speakers

- External speakers will be vetted prior to any event taking place via a thorough risk assessment process
- External speakers will be risk assessed in terms of the Prevent agenda

Health and Safety, IT Systems

- All learner employment premises are risk assessed for H&S and safeguarding/ Prevent requirements
- Data Protection and Privacy considerations take into account the safeguarding of learners and staff
- IT and cyber-security procedures are explained to learners to keep them safe from online forms of exploitation, including cyber-bullying, grooming and recruitment to extremist organisations (e.g. terrorist groups)

Employers

- Employers are made aware of their responsibility to safeguard their staff
- Employers are made aware of their responsibility in regards to the Prevent agenda
- Employers are made aware of their responsibility in regards to online safety
- Employers are made aware of the Safeguarding Lead's contact details and when and how to get in contact

Quality

- Quality performance measures cover Safeguarding, Prevent and Equality & Diversity
- H&S and Safeguarding assessments are checked at least annually during audit
- Learners and staff are familiar with the EMD Safeguarding Statement: ***“Anything you tell me is in confidence unless I feel that you or someone else may be at risk of harm”***
This statement is included in Course Handbooks and on wall displays in EMD classrooms.
- Establish and maintain an ethos where learners feel secure, encouraged to talk, are listened to and are given feedback on changes relating to their comments
- Ensure learners know that there are staff in EMD whom they can approach if they are worried or in difficulty and ensure learners can participate in feedback sessions to report on issues affecting themselves or their peers.
- Embed and promote at every opportunity: safeguarding, Fundamental British Values, personal development and well-being and the skills learners need to stay safe and keep others safe

Reporting

- Procedures are in place for the appointed Safeguarding Champion to refer and report incidents to the appropriate service (refer to Reporting Procedure Flowchart)
- Parents, guardians and carers are provided with clear principles of practice regarding the responsibilities placed upon EMD and staff when acting in ‘loco parentis’ for young people
- We keep clear detailed written records of concerns about learners even where there is no referral. The records are to be made as soon as practicable and kept on the company server in a password protected area
- Written records (as outlined above) are updated as required and made available to the relevant authorities
- Ensure that any trends in safeguarding issues are identified by the Safeguarding Lead
- The Safeguarding Lead will ensure that any reports relating to safeguarding are ‘restricted access & confidential’ password protect documents
- The Safeguarding Lead will ensure that where any safeguarding issues relating to online extremism, including potential recruitment to terrorist organisations, details about the online content will be reported to the Home Office via the website <https://www.gov.uk/report-terrorism> or the relevant counter-terrorism unit
- Staff are aware of the Channel Panel and how this facility can support learners and staff to deal with safeguarding and Prevent issues as appropriate
- Staff are aware of the ‘Seven Golden Rules to Sharing Information’ (as detailed below)

Preventing unsuitable people from working with vulnerable learners

EMD will operate safe recruitment practices including ensuring Disclosure and Disbarring Service reference checks are undertaken. An acceptable DBS will be a condition of employment.

EMD will ensure that any disciplinary proceedings against staff relating to Safeguarding matters are concluded in full even when the member of staff is no longer employed at EMD and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

EMD will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with young people, parents and guardians.

All staff and volunteers are aware that disclosure will be made to third parties where required and that they will be required to cooperate with any subsequent enquiry or investigation.

The seven golden rules to sharing information

Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers:

1. Remember that Data Protection and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing

it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Monitoring and Evaluation

Senior management will on annual basis monitor and evaluate all issues relating to Safeguarding, recording findings and recommendations in the Self-Assessment Report.

Required improvement will be recorded, implemented and reviewed within the Quality Improvement Plan.

Support & Related Documentation

- Safeguarding Risk Assessments
- External Speakers Policy and Risk Assessment
- Safeguarding and Toileting Policy and Procedure
- Safeguarding Reporting Concerns Form
- Safeguarding Reporting Procedure
- Safeguarding & Prevent referral Agencies Contact Sheet
- The Channel Process within FE Colleges.

Policy Review

This policy will be reviewed by the EMD management team annually, or more frequently as required, to ensure that it continues to be effective.