



Safeguarding policy

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Safeguarding policy

1 COLLEGE MISSION AND VALUES

2 DEFINITIONS

2.1 Child - A person under eighteen years of age.

2.2 Vulnerable Adult - A person, aged over 18 who is, or may be, in need of Community Care Services by reason of mental or other disabilities, age or illness, or may be unable to take care of him/herself, or unable to protect him/ herself against significant harm or exploitation. Examples of vulnerable adults are people with learning disabilities, mental health problems, the elderly, and people with physical disabilities.

2.3 Abuse - Abuse is behaviour towards a person that either deliberately or unknowingly causes a child or vulnerable adult harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated. Appendix 2 sets out definitions of abuse under the following headings

- Physical
- Psychological/emotional
- Sexual
- Neglectful
- Financial/material
- Institutional
- Discriminatory
- Significant harm
- Radicalisation

3 POLICY STATEMENT

3.1 The College is committed to ensuring that all its students remain safe and free from harm and to playing a full and active part in the multi-agency response to child and vulnerable adults' protection concerns. This document sets out the College's position in relation to all aspects of the child and vulnerable adult protection process.

4 POLICY STANDARDS

4.1 There will be an annual report summarising how the policy has been met with key points to note. In addition there is a Corporation safeguarding lead.

5 RESPONSIBILITIES

5.1 The person responsible for implementation of the policy is Anna Openshaw Lawrence who is the Designated Lead for Safeguarding. Her Deputies are Ben Humpage, Director of Learner Experience and Gavin Prime, Head of Security and they have a team of safeguarding officers:

Diana Brown - Deputy Head of Student Development Services
Laura Armstrong - Head of Department – ESOL

Pat Nickless	- Learning Support Coordinator
Tim Weston	- Section Manager – Trowel Trades
Mervyn Ross	- Deputy Director of Curriculum – Construction and Engineering
Helen Crabtree	- Manager – School Links 14-16
Phyllis Scoon	- Head of Department – ICT & Business

6 LEGISLATIVE FRAMEWORK

- 6.1 The College has a duty, under the Children’s Act 1989, to promote and safeguard the welfare of children under the age of 18. It also has a duty, under the Protection of Vulnerable Adults Scheme 2004, to promote and safeguard the welfare of vulnerable adults. The Education Act 2002 requires governing bodies of further education colleges to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

7 LINKS TO OTHER POLICIES

<W:\College Policies and Management Bulletins\CollegePolicies\Anti Bullying Policy.docx>

<W:\College Policies and Management Bulletins\CollegePolicies\College Tutorial Policy.pdf>

<W:\College Policies and Management Bulletins\CollegePolicies\Single Equality Scheme.pdf>

8 SCOPE OF THE POLICY

- 8.1 This Policy applies to all staff (including governors employed by the College, temporary staff, agency workers and volunteers), learners and employers. All have a legal responsibility to take seriously any concerns about a child or vulnerable adult that come to their attention and follow the procedures given.
- 8.2 Placement providers and subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting one of the Designated Safeguarding Officers with responsibility for Safeguarding in College.
- 8.3 It is not the College's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

9 GUIDANCE AND PROCEDURE FOR STAFF

- 9.1 All members of staff involved with children and vulnerable adults (teaching and non-teaching) have a responsibility to be mindful of issues related to their safety and welfare and a **duty** to report and refer any concerns however “minor” they appear to be.
- 9.2 In cases where it is deemed that a child or vulnerable person lacks sufficient understanding to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed of any concerns about the child’s / vulnerable person’s welfare or any action taken to safeguard and promote the child’s / vulnerable adult’s welfare, providing this does not compromise the child’s / vulnerable adult’s safety.
- 9.3 Where there are possible concerns about a child’s / vulnerable adult’s safety, unconditional confidentiality cannot be guaranteed and should not be offered.

- 9.4 The College will be proactive and take positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns. Students away from College premises, e.g. on work experience, will be given advice on who to contact and how to contact them should they have concerns or suffer abuse.
- 9.5 When students make allegations about abuse or neglect, they should always be listened to and have their comments taken seriously – guidance can be found at Appendix 1). If you suspect that a student is going to disclose information about abuse, either towards themselves or another child or vulnerable adult, establish ground rules regarding confidentiality.

If the student is fully aware of what could happen, they can:

- choose whether they want to speak now or have time to think about it;
- be as informed as possible regarding the implications of passing on this information.

If the complainant is the child / vulnerable adult, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

- 9.6 Where a member of staff has concerns about the welfare and safeguarding of a child or vulnerable adult, a member of staff close to that individual should meet with the learner in order to share these concerns. A member of staff does not need to wait until a child or vulnerable adult discloses to them in order to complete a safeguarding referral form; they should complete if they have significant concerns about the welfare and safeguarding of that person.
- 9.7 A full record of the disclosure / concerns shall be made as soon as possible on the Safeguarding Record Form– Appendix 3. This form is to be submitted to the Safeguarding Officers at safeguarding@cnwl.ac.uk
- 9.8 If you have concerns regarding the **immediate** safety and or wellbeing of a child or vulnerable adult and you are unable to get hold of a safeguarding officer you should contact a member of the Senior Team liaise with the local Authority on:
One Stop Service: 020 8937 4300 or after hours on 020 8863 5250
- Other useful contacts: (also see appendix 4)
- Police Community Safety Unit 020 8733 3742
 - Brent Carers Centre (for carers) 020 8795 6240
 - Action of Elder Abuse helpline 080 8808 8141
- 9.9 On receipt of the Child Protection / Vulnerable Adult Safeguarding Record Form you will be contacted via email by one of the Designated Safeguarding Officers who will discuss with you what happens next. If required, the Designated Safeguarding Officer will contact the Local Authority in order to discuss appropriate action.

10 PREVENTION OF VIOLENT EXTREMISM – THE ‘PREVENT’ AGENDA

- 10.1 In February 2008 the Government published guidance to local partners including colleges on preventing violent extremism. While the guidance was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups.
- 10.2 Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.

- 10.3 College staff should be aware of signs of radicalisation and have the confidence to report their concerns
- 10.4 The College will also promote the ethos of the 'Prevent' agenda by encouraging free and open debate but challenging extreme views. It will encourage through its classroom practice, theme weeks and induction activities, a belief in Equality of Opportunity and the celebration of Diversity.
- 10.5 The College will not host or allow its premises to be used by extreme groups and will seek to prevent the distribution of extreme literature.
- 10.6 The college has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject in the college and must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of the college and could constitute misconduct.
- 10.7 The College will provide appropriate support through its own staff or by referral to external agencies, for any student in danger of radicalisation.

11 RESPONDING TO AN ALLEGATIONS ABOUT A MEMBER OF STAFF

- 11.1 Any suspicions or allegations of actual abuse of a child or vulnerable adult by a member of staff must be reported to the Director of Human Resources (or in their absence the Head of Student Development Services) immediately.

They will:

Take such steps as he/she considers necessary to ensure the safety and wellbeing of the child/vulnerable adult in question and any other person who might be at risk.

Initiate an investigation of this incident in line with the College disciplinary procedure.

Report the matter to the Local Authority as required (Appendix 5)

- 11.2 If the complaint is made against any member of the Senior Leadership Team or a Designated Safeguarding Officer, then the person dealing with the complaint must be the Principal. If the complaint is made against the Principal then the Chair of the Corporation should be immediately notified.

12 WRITTEN RECORDS

- 12.1 The Executive office will retain the central record of all Child Protection / Vulnerable Adult Safeguarding Record Forms.
- 12.2 Copies of reports, notes etc will be kept securely locked at all times, but will be shared in accordance with the Data Protection Act 1998.

13 SAFE RECRUITMENT OF STAFF

- 13.1 The College of North West London undertakes to ensure that its staff are fit to work in a College setting with children and vulnerable adults. It reserves the right to refuse to employ anyone whom it has reasonable belief may pose a risk to its learners.
- 13.2 The College has systems in place to prevent unsuitable people from working with children and/or vulnerable adults and to promote safe practices. These systems apply to all new staff.
- 13.3 The College undertakes Disclosure and Baring Service (DBS) checks on individuals and also commits to obtaining satisfactory references from previous employers.

14 TRAINING – STAFF DEVELOPMENT

- 14.1 All staff within the College undertake regular training so that they are fully aware of this policy and their responsibilities within it. This training will be updated every three years.
- 14.2 Training will be applicable to members of the College community not employed directly by the College, to include security and catering staff, along with members of the governing body and volunteers.
- 14.3 Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities to the protection of vulnerable adults at the College. This training will be updated annually.

15 COMMUNICATION

- 15.1 Safeguarding themes are mapped and delivered to full time 16-18 year olds through the group tutorial programme.
- 15.2 The students' Virtual Learning Environment (VLE) will display information and guidance to learners on safeguarding, and offer referral links for learners who require additional / external support.
- 15.3 The College intranet will clearly signpost staff to information and guidance regarding issues of safeguarding.
- 15.4 Safeguarding and the promotion of learner welfare will be a key agenda item within the student induction process
- 15.5 The learner questionnaire will seek learner feedback on how safe learners feel.

16 REVIEW AND MONITORING OF THE POLICY AND PROCEDURES

- 16.1 The delivery of safeguarding themes will be monitored through developmental observations and learning walks
- 16.2 The outcome of learner surveys will be reported to the Executive Team and to the Corporation and action taken to address areas of concern.
- 16.3 The Vice Principal People and Planning will review and monitor the policy and procedures on an annual basis and will recommend and implement approved changes where necessary
- 16.4 The Vice Principal People and Planning will produce an annual report on safeguarding for the Corporation.

Dealing with allegations from a child or vulnerable adult

This procedure **must** be followed whenever any member of College staff hears an allegation from a child or vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child or vulnerable adult may be abused:

RECEIVE

- What is said;
- Accept what you are told – you do not need to decide whether or not it is true;
- Listen without displaying shock or disbelief.

REASSURE

- The student;
- Acknowledge their courage in telling;
- Do not promise confidentiality;
- Remind them they are not to blame – avoid criticising the alleged perpetrator;
- Do not promise that “everything will be alright now” (it might not be).

REACT

- Respond to the student but do not interrogate;
- Avoid leading questions but ask open ended ones;
- Clarify anything you do not understand;
- Explain what you will do next, i.e. inform a Safeguarding Officer

RECORD

- Make notes as soon as possible – during the interview if you can;
- Complete Safeguarding Record Form
 - Include:
 - The student’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance
- Do not destroy your original notes – they may be needed later on

SUPPORT

- Consider what support is needed for the student– you may need to give them a lot of your time or they may need to be referred;
- Ensure you are supported – such interviews can be extremely stressful and time consuming

Definitions of Abuse

Physical Abuse

Physical abuse is the physical ill treatment of a child or vulnerable adult, which may or may not cause physical injury and causes harm to the individual's person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring. This could also include female genital mutilation (FGM)

Psychological and Emotional Abuse

Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of cyber abuse. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse. This could also include forced marriage.

Sexual Abuse

Sexual abuse involves a child or vulnerable adult participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual.

The activities may include: physical contact, including penetrative or non-penetrative acts, e.g. rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person's body (e.g. breasts, buttocks, genital area); Non-contact activities, e.g. exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

Neglect

Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for the child or vulnerable adult to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to assess risk. Neglect may involve: failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs

Financial/Material Abuse

Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person's financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual, obtaining money by deception, or stealing money. It includes the withholding of money or the improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

Institutional Abuse

Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users' relationships and activities.

Discriminatory Abuse

Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal health or social care.

Significant Harm

Sometimes, a single traumatic event may constitute significant harm, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adult's physical and psychological development.

Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or for a person who moves to adopt violence in support of their particular ideology. Although a number of possible behavioural indicators are listed below, staff should use their professional judgement and discuss with other colleagues or external partners if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

Safeguarding Record

(all details to be completed by the referrer)

1 Student Details			
Name:	Address:		
ID No:			
Telephone No:	D.O.B:	Female <input type="checkbox"/>	Male <input type="checkbox"/>
Curriculum area:			
Course:		Course Code:	
2 Details of the Case			
Case brief:			
Details:			
Action taken (if any):			
Assessment/Possible Risk:			
Referred to Social services Y/N If Y please provide details			

3 Details of individual completing this record

Name:	Position:
College Extension Number and Email:	Other contact number:
Signature:	Date:

Completed forms must be submitted to any of the following designated Safeguarding Officers and copy to the Secretariat:
**Anna Openshaw-Lawrence (Chief Officer) / Ben Humpage / Diana Brown / Tim Weston / Pat Nickless /
Laura Armstrong / Gavin Prime / Mervyn Ross / Phyllis Scoon / Helen Crabtree**

4 To be completed by Safeguarding Officer

Action taken:

Signature: **Date:**

Safeguarding: Contacts

College Designated Safeguarding Officers

Anna Openshaw	x 5100
Phyllis Scoon	x 5420
Ben Humpage	x 5129
Helen Crabtree	x 5112
Alison Eaglestone	x 5043
Mervyn Ross	x 5353
Laura Armstrong	x 5025
Tim Weston	x 5362
Gavin Prime	x 5964
Diana Brown	x 5664

National Society Prevention of Cruelty to Children - NSPCC Helpline Tel: 0808 800 500

AFRUCA – Africans Unite against Child Abuse Tel: 020 7704 2261

AFRUCA is an organisation concerned about cruelty against the African child, running events and doing educational and research work.

London Borough of Brent Contact Numbers

Please contact Brent Children's Social Care Services on: **020 8937 4300** during normal office hours (9am - 5pm) or Brent's Emergency Duty Team after hours on: **020 8863 5250**.

If you believe a child is in immediate danger you should phone the police on: **999**.

Brent Social Services Duty Desks – Protection of Vulnerable Adults
020 8937 4300

Brent Mind 020 7604 5177

Police service Community Safety Unit
Willesden Police Station **020 8733 3918**

Action on Elder Abuse 080 8808 8141

Practitioner Alliance for safeguarding adults (PASA) 0791 789 2350

Brent Carers Centre 020 8795 6240

Carers UK
0808 808 7777 (helpline)

Forced Marriage Unit (0) 20 7008 0151

Prevent (combatting radicalisation) Chris Bowles 07769 282 759

Responding to an allegation about a member of staff

1. It is essential that any allegation of abuse made against a member of staff (including a service provider) is dealt with fairly, quickly and consistently, in a way that provides effective protection for the child/vulnerable adult and at the same time supports the subject of the allegation.
2. Any suspicions or allegations of actual abuse of a child or vulnerable adult must be reported to the Director of Human Resources immediately (or in their absence, another member of the Executive Management Team).
3. In the case of an allegation concerning a child further action will be taken with reference to the Safeguarding Children and Safer Recruitment Practices Regulations (Chapter 5). This will involve the Director of Human Resources immediately informing the Local Authority Designated Officer (LADO) who will examine the 'case' independently and objectively. The LADO will then discuss the appropriate process of investigation with the Director of Human Resources (e.g. College disciplinary investigation, or in the case of a more serious allegation, a Police investigation).
4. The subject of the allegation will be informed of the allegation as soon as possible after consultation with the LADO has taken place. Similarly, the child's parents/carers will be informed of the allegation as soon as possible, by either the College or LADO.
5. The College will implement the College disciplinary process in consultation with the LADO.
6. The Director of Human Resources (or other designated officer) will continue to liaise with the LADO, who will monitor the progress of the case.
7. On the completion of the investigation the Director of Human Resources will consult with the LADO concerning the findings and the appropriateness of a disciplinary hearing.
8. If on conclusion of the case it results in dismissal or ceasing to use the services of the subject of the allegation then a referral may be made to the Independent Safeguarding Authority (ISA), following consultation with the LADO.