



P O L I C Y

TITLE:	Safeguarding Children and Vulnerable Adults Policy
AIM:	To ensure that learners are safe and that they feel safe
RELATED POLICIES & PROCEDURES:	Disclosure Policy Safety, Health and Environment Policy Learner Disciplinary Policy Recruitment and Selection Policy Tutorial Policy Restrictive Physical Intervention Policy Allegations of Abuse Against Staff Substance Mis-Use (Learners) Policy Anti-Bullying Policy Fitness to Study Policy Room Letting Procedure Code of Practice - Freedom of Speech Code of Conduct Whistleblowing ICT Acceptable Use Policy Lockdown Procedure Data Handling, Security and Communications Policy
DATE FOR IMPLEMENTATION:	<i>Please complete if different from 'Approval date' below.</i>
APPROVED BY:	College Executive Team Board of the Corporation
DATE OF APPROVAL:	October 2019
DATE OF NEXT REVIEW:	October 2020
DISTRIBUTION:	All staff and students via the Intranet
VERSION CONTROL:	Previous version approved October 2018
PERSON RESPONSIBLE:	Assistant Principal: Information, Planning, Learner Experience, Inclusion and Curriculum Operations

EQUALITY IMPACT ASSESSMENT		
Phase 1 Initial Screening completed	Date:	3 October 2011
Phase 2 Full impact assessment completed/ not required	<input checked="" type="checkbox"/> Not required	<i>(please tick if appropriate)</i>
	Completed on (if applicable):	
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SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

COLLEGE CONTEXT

The College recruits learners from different local authorities, with the vast majority living in the East Riding of Yorkshire, and a small proportion resident in Hull, North Yorkshire and the wider area. The College has well-established and fully embedded arrangements in place for reporting and recording of safeguarding concerns, with a centralised system (ProMonitor) in place to support this. In addition to designated safeguarding leads, the guidance team provide a range of pastoral and welfare support services including signposting learners to relevant external support agencies. Comprehensive support is also in place for children who are “looked after”.

The College’s tutorial and enrichment programme includes a key focus on safeguarding, health and wellbeing which is designed to build resilience and raise awareness of how learners can keep themselves safe. This is supported by the East Riding of Yorkshire Council and a range of external agencies.

SCOPE AND PURPOSE

East Riding College is committed to protecting all children, young people and vulnerable adults from harm whatever their age, sex, ethnicity, disability, language, faith and / or sexual orientation.

The College shares an objective with all educational institutions and agencies working with children, young people and vulnerable adults to identify children, young people and vulnerable adults who are suffering or likely to suffer significant harm, and take appropriate action with the aim of making sure they are kept safe from neglect, physical abuse or injury, sexual abuse and emotional abuse.

The College is committed to safeguarding all young learners and vulnerable adults. This will be achieved by having in place effective systems designed to:

- minimise risks to the health and well-being of children and vulnerable adults;
- protect children, young people and vulnerable adults from physical, sexual and emotional abuse, neglect and bullying;
- identify instances in which there are grounds for concern about a child or vulnerable adult’s welfare and initiate/take appropriate action to keep them safe;
- enable learners to raise concerns relating to their health, safety and well-being and that of other children and vulnerable adults, and for those concerns to be actioned;
- contribute through the Local Safeguarding Children Partnership (LSCP) to effective partnership working between all those involved with providing services for children and vulnerable adults;
- assist local social services departments on child and vulnerable adult protection matters;
- encourage children and vulnerable adults to lead healthy lifestyles
- encourage learners to be actively involved in their community, to make a positive contribution to society and not to engage in anti-social or offensive behaviour
- support the development of learners to enable them to fulfil their potential in life and to achieve economic well-being

- prevent learners from being drawn into terrorism, including violent and non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Due regard will be paid to statutory provisions that have a bearing on this area, the most important of which are:

- Statutory Guidance for Schools and Colleges published by the Department for Education in April 2014 and updated in September 2019.
- Working Together to Safeguard Children, a Guide to Inter-Agency Working to Safeguard Children and Promote the Welfare of Children, updated by HM Government in March 2015.
- The Safeguarding Vulnerable Groups Act 2006 which requires that those wishing to work with children or vulnerable adults be registered with the Disclosure and Barring Service and places a duty upon employers to inform the Disclosure and Barring Service of any individual, paid employee, volunteer or other who poses a threat to children or vulnerable adults.
- The Children Act (2004) which requires Local Authorities to replace non-statutory Area Child Protection Committees with statutory Local Safeguarding Children Boards.
- Section 175 of the Education Act 2002, which requires FE Colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children and vulnerable adults, paying regard to any guidance issued by the Secretary of State in considering what arrangements they need to make.
- Section 27 of the Children Act 1989, which requires FE Colleges to assist in the exercise of the duty put on Local Authorities to safeguard and promote the welfare of children and vulnerable adults within their area.
- Section 26 of the Counter-Terrorism Act 2015, and Statutory Guidance issued under section 29 of the Act (Prevent Duty Guidance: for England and Wales, and Prevent Duty Guidance: for further education institutions in England and Wales).

Due regard has also been paid to the statutory and non-statutory guidance given to the Protection of Freedoms Act 2012 and the Local Authority's Safeguarding Children's Partnership Procedures and Guidance.

The policy applies to learners under the age of 18 and any adult deemed to be vulnerable because s/he is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

The College is also committed to:

- preventing unsuitable people working with children, young people and vulnerable adults;
- providing a safe working environment for all learners
- promoting safe practice and challenging poor and unsafe practice;
- promoting the welfare of children, young people and vulnerable adults.

The College will not under any circumstances tolerate the bullying or harassment of any learner.

RESPONSIBILITIES

College

The responsibility for making sure these arrangements are in place is put on the College's Governing Body which is accountable for ensuring that the College has effective policies and procedures in place in accordance with statutory guidance, and monitoring the College's compliance with them.

The College will ensure that:

- It has a Safeguarding Children and Vulnerable Adults Policy, that procedures are in place consistent with locally agreed inter-agency procedures and that the policy is made available to students through the Intranet and to parents upon request.

It has a nominated Governor who will ensure that the policy and associated procedure are monitored, and who will report annually to the Corporation on their operation and will be kept informed of any allegations against staff.

The College has a responsibility, in accordance with the Statutory Guidance associated with the Counter-Terrorism and Security Act 2015, to have "due regard, in the exercise of its functions, to the need to prevent people from being drawn into terrorism". This policy sets out the arrangements which the college has to fulfil this responsibility.

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism may be either violent or non-violent and would include the extreme right.

Radicalisation is defined as "the process by which people come to support terrorism and violent extremism and, in some cases, then join terrorist groups."

Named Persons

A senior member of the institution's staff is designated to take lead responsibility for Safeguarding. Lead responsibility resides with the Assistant Principal: Information, Planning, Learner Experience, Inclusion and Curriculum Operations with operational responsibility delegated to the Client Services and Enrichment Manager, who is the Designated Safeguarding Officer and deputy Safeguarding Lead.

In the absence of the designated Safeguarding Officer a member of the Guidance team or the Assistant Principal, will deputise.

Responsibilities of the Designated Safeguarding Officer and their deputy/deputies are to;

- Refer cases of suspected abuse or allegations to the relevant investigating agencies;
- Act as a source of support, advice and expertise within the College;
- Liaise with schools or other agencies concerned with placing young people aged under 16 on College courses and ensure that appropriate safeguarding arrangements are in place;
- Have a working knowledge of how LSCPs operate, the conduct of a child protection/vulnerable adults case conference and be able to attend and contribute to these effectively when required to do so;

- Liaise with the Local Authority with regards 'Looked After' children in conjunction with the Guidance and School Liaison Manager
- Ensure all staff, governors and volunteers have appropriate training commensurate with their level of responsibility relating to the safeguarding of children and vulnerable adults including recognising signs of abuse and knowing how to respond to disclosures;
- Ensure each member of staff, governor and volunteer has access to and understands the College's Safeguarding Children and Vulnerable Adults Policy, especially new or part time staff;
- Ensure all staff, governors and volunteers have induction training covering child protection/vulnerable adults and are able to recognise and report any concerns immediately they arise;
- Ensure that appropriate staff development is provided for staff, governors and volunteers and that refresher training is completed every three years;
- Keep detailed, accurate, secure written records of referrals/concerns, where possible within the confidential comments section of ProMonitor;
- Attend any relevant or refresher training courses organised by the LSCB, or other relevant external organisation, at least every two years;
- Ensure that the College's Safeguarding Children and vulnerable adults policy is updated and reviewed annually;
- Ensure that all staff, whether permanent or temporary, and volunteers who will work with children or vulnerable adults are given a written statement about the College's policy and procedures, and the name and contact details of the designated person when they join the College;
- Liaise where appropriate with other agencies to safeguard learners upon completion of their programme.

All Staff, Governors and Volunteers

It is the responsibility of all staff, governors and volunteers to be aware of the need to alert the Designated Officer when they believe a child or vulnerable adult has been abused or is at risk of abuse.

Every member of staff has a responsibility to prevent learners from being drawn into terrorism in accordance with the requirements of this policy and to report concerns relating to those who might be vulnerable to exploitation or who they suspect may be being exploited by radicalising influences.

The Designated Officer is the Client Services and Enrichment Manager. The Director with special responsibility is the Assistant Principal: Information, Planning, Learner Experience, Inclusion and Curriculum Operations. The Governor with special responsibility for Safeguarding is confirmed annually.

The policy applies to learners under the age of 18 but the College will extend this definition to the age of 24 for those people with learning difficulties, or to any adult deemed by the College to be vulnerable. The College will act on their behalf if required.

It is important that learners are protected from abuse and as such, all complaints, allegations or suspicions must be taken seriously and reported to the Designated Officer immediately. Staff

should not make promises of secrecy, questioning should be kept to the minimum necessary to understand what is alleged and leading questions should be avoided, neither should any attempt be made to investigate or explore allegations. The inappropriate involvement of a member of staff could jeopardise the investigation of allegations and any subsequent legal proceedings.

Abuse can involve any one or more of the following: neglect, physical injury, sexual abuse and emotional abuse and, additionally for vulnerable adults, financial or material abuse and discriminatory abuse.

Staff should be aware that all forms of abuse can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to bullying (including cyberbullying); physical abuse; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

All staff and the Designated Safeguarding Officer and deputies should also consider the context within which such incidents and/or behaviours occur, i.e. consideration should be given to whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare. Such information should be shared as part of the referral process to allow any assessment to consider all of the available evidence and the full context of any abuse.

The harm or possible harm of a child or vulnerable adult may come to our attention in a number of different ways including, but not limited to, the following:

- **Information being given** by the child or vulnerable adult, his/her friends, a family member or close associate.
- **The child or vulnerable adult's behaviour** may have become significantly different from usual; significantly different from the behaviour of his/her peers; be bizarre or unusual; involve the child or vulnerable adult acting out a harmful situation in his/her behaviour.
- **An injury may arouse suspicion because** it does not make sense when compared to the explanation given and/or explanations differ depending upon who is giving them.
- **Suspicion being raised** when a number of factors occur over time, for example when a child or vulnerable adult fails to progress and thrive in contrast to his/her peers without explanation.

Staff should also give consideration to potential indicators for female learners who may be at risk of Female Genital Mutilation (FGM). Teaching staff with any concerns relating to learners at risk of FGM have a mandatory duty to report these directly to the police, and inform the Designated Safeguarding Officer. More information is available in the [FGM Fact Sheet](#). For learners who live in the East Riding of Yorkshire, a direct report to the police can be made via the Early Help and Safeguarding Hub (EHaSH).

Staff should be aware of indicators which may signal that learners are at risk from, or are involved with serious crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Further information can be found in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance

If staff become aware that a learner who is disabled and under the age of 18 is, or may be cared for by someone who is not their parent or a close relative¹ for 28 days or more, in a private arrangement made between a parent and a carer, they must notify the Designated Safeguarding Officer and a referral to EHASH will be made. Similarly, if staff become aware that a “direct payments” worker is engaged by parents for overnight supervision of a learner who is disabled and under the age of 18, they must notify the Designated Safeguarding Officer and a referral to EHASH will be made.

For learners aged 14-16 who are attending the College as part of the Local Authority’s Commissioned Placements provision, local authority procedures should be followed regarding any children who are missing. Where staff have specific concerns relating to learners aged 16-18 who are potentially thought to have gone missing, this should be referred to the Designated Safeguarding Officer.

In any cases of doubt contact the Client Services and Enrichment Manager or the Assistant Principal for advice.

PROCEDURE

When a disclosure of harm is made, it is important that the following principles are adhered to:

- Listen to what the child or vulnerable adult has to say with an open mind.
- Do not ask probing or leading questions.
- Never stop a child or vulnerable adult who is freely recalling significant events.
- Make a note of the discussion, taking care to record the timing, setting and people present as well as what was said.
- Never promise the child or vulnerable adult that what they have told you can be kept secret. Learners should be promised confidentiality but never secrecy. Explain that you have a responsibility to report what the child or vulnerable adult has said to someone else.
- Record all subsequent events up to the time of referral to the nominated person in writing, wherever possible attempt to record what the child or vulnerable adult said verbatim.
- Records of disclosure should be passed to the Designated Officer immediately. The initial contact with the nominated person may be by telephone or e-mail, with written records being passed within 24 hours of first contact. After making a referral to the Designated Officer, record the details on ProMonitor.
- The Designated Officer will make a decision, taking advice from the Early Help and Safeguarding Hub (for children in the East Riding) or relevant Safeguarding Hub where appropriate, based on information available as to whether there is a sustainable allegation and/or cause for concern. Where a referral is made a Safeguarding Hub referral form will be completed and forwarded to the relevant service, if required. A copy of the referral form and any internal incident report will be retained by the College in a confidential file.
- Where the College has made a referral to EHASH or the relevant local authority’s Safeguarding Hub, the Designated Safeguarding Officer or deputy will record the outcome of the referral in ProMonitor. Where the outcome is not communicated back to the College by the Safeguarding Hub, the College will follow up to confirm the outcome.

¹ Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether full blood, half blood, or marriage/affinity)

- If it is decided that there is insufficient evidence available or that the allegation cannot be sustained, this judgement will be recorded on ProMonitor
- In applying the Safeguarding policy, staff members must have due regard for local Child Protection arrangements, including the requirement to contribute to Child Protection multi-agency meetings, and the requirement to share relevant information.
- Where any disclosure of cause for concern over the safety and welfare of any young person or vulnerable adult implicates a member of College staff, that information will be passed to the Director of Human Resources, Facilities & SHE, and the Local Authority Designated Officer (LADO) will be informed. Where an investigation determines that disciplinary action is required, the nominated Governor will also be informed. Referrals will be dealt with in accordance with the College's Allegations of Abuse Against Staff Policy.
- Feedback received from external agencies will be logged on ProMonitor and stored in a secure place if documents are shared.

In the case of peer on peer abuse, staff should be clear that abuse will not be tolerated and all peer on peer abuse is unacceptable and will be viewed seriously. Staff should discuss any concerns relating to peer on peer abuse with the Designated Safeguarding Officer who will advise on whether the incident should be investigated via the College's disciplinary arrangements, referred to the Early Help and Safeguarding Hub, or both.

CONFIDENTIALITY

The College recognises that all matters relating to Child Protection are highly confidential and the Designated Safeguarding Officers will share information on a "need to know, what and when" basis.

Staff are made aware that these concerns or other matters relating to students should never be discussed elsewhere, inside or outside the College, unless in confidential meetings organised for that purpose. This includes the passing of written information or verbal discussion in any media including social networking sites.

Staff are aware that breaches of confidentiality and/or data protection regulations risks bringing the College into disrepute and in specific circumstances may place learners or other young people at risk, and any such breaches may result in disciplinary action.

ADDITIONAL CONSIDERATIONS RELATING TO THE COLLEGE'S PREVENT DUTY

The College will;

- communicate and promote the importance of the duty
- ensure that staff implement the duty effectively
- build its capabilities to mitigate the risk of learners being drawn into terrorism
- ensure that staff involved in the implementation of this policy receive appropriate training
- ensure that staff understand what is meant by the term extremism, the relationship between extremism and terrorism, what radicalisation means and why people may be vulnerable
- ensure that staff know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it
- ensure that staff understand how to obtain support for those who may be being exploited by radicalising influences

Sharing information

The College will, in accordance with its Data Handling, Security and Communications Policy, share personal information to ensure, for example, that a person at risk of radicalisation is given appropriate support (for example through the Channel programme).

There may be some circumstances where the College, in the course of Prevent-related work, identifies someone who may already be engaged in illegal terrorist-related activity. People suspected of being involved in such activity would be referred to the police.

Partnership

The College will work in partnership with the regional Prevent Co-ordinator, the police and local authorities, including participation in relevant multi-agency forums, to prevent learners being drawn into terrorism.

Risk assessment

The College will assess the risk of members of the college community being drawn into terrorism and the controls which are in place to mitigate the risks identified and put in place additional controls where it is necessary to do so. That risk assessment will be subject to review in accordance with the review period associated with this policy or, alternatively, reviewed when it is appropriate to do so in light of changes in the level of risk or the identification of potential additional risks.

Staff training and development

The College will train governors, leaders and staff to ensure that they;

- understand what is meant by the term extremism, the relationship between extremism and terrorism, what radicalisation means and why people may be vulnerable
- are able to recognise those who may be vulnerable
- know how to obtain support for those who may be being exploited by radicalising influences and how to report those concerns

The College will work with the regional Prevent Co-ordinator to ensure that training is appropriate.

Welfare and pastoral care

The College will maintain strong welfare and pastoral care arrangements for learners including;

- a designated personal tutor for all full-time learners
- regular one to one and group tutorial activities for all full-time learners
- a tutorial entitlement including mandatory topics relating to equality and diversity, citizenship and safeguarding, including online safety and the risk of radicalisation
- A confidential counselling service
- A qualified team of guidance officers available to support learners on each site
- Robust safeguarding arrangements including internal reporting arrangements
- A comprehensive programme of enrichment activities designed to support the development of social, moral, spiritual and cultural awareness, knowledge and understanding
- A varied programme of fairs and fund raising activities, developed in partnership with local community organisations, designed to engage learners with their local community
- A partnership with relevant local organisations designed to develop social, moral and cultural understanding

- An annual equality and diversity month

Through its tutorial and enrichment activities the College will promote British values including democracy, the rule of law, individual liberty, and mutual respect and tolerance for those with different faiths and belief.

Speakers and events

The College reserves the right to determine who is permitted to enter its premises. The College will not permit external speakers or organisations holding extremist views, either violent or non-violent, including the extreme right, to use College premises for any purpose.

The College reserves the right to decline requests for the use of its premises where insufficient lead time is provided for it to check on the credibility of the individual or organisation requesting use of its premises and or the nature of the event or activity to be held.

All enquiries for the use of the College's premises by external organisations will be channelled through the College's estates team who, when necessary, will consult with the Assistant Principal to determine the suitability of any organisation requesting use of the College's premises. The College reserves the right to request information relating to the topics to be covered and any materials and resources to be used as well as information relating to potential attendees. Further details are included within the College's Room Letting Procedure and the College's Code of Practice - Freedom of Speech.

The Assistant Principal shall be responsible for determining the suitability of visiting speakers contributing to the delivery of the cross college enrichment programme and learner tutorial activities.

Where external speakers are to be involved in contributing to the delivery of enrichment or any other element of a learning programme offered by the College, contact with learners will generally be supervised. Where external speakers who are new to the College are to have unsupervised contact with learners (e.g. during the induction fair), or are scheduled to spend more than 2 hours with learners, the coordinating member of staff must complete an "External speaker/Guest checklist" (see Appendix 1), which must be approved by their line manager. Where any potential concerns are identified regarding the individual or organisation, to indicate that they present a risk of drawing learners, members of College staff, or the wider community into terrorism, the decision to approve the external speaker must be referred to the Assistant Principal. Copies of completed External speaker/Guest checklists will be held centrally.

All learners are required to behave in a manner consistent with the learner code of conduct set out within the learner agreement.

All members of staff are required to behave in a manner consistent with the staff code of conduct.

All members of the college community are required to act in a manner consistent with both the College's and their personal responsibility to safeguard children and vulnerable adults.

All visitors to the College are required to register upon arrival and, in accordance with stringent safeguarding arrangements, be accompanied at all times.

The College does not permit access to its premises by individuals or organisations other than staff, authorised visitors, enrolled learners, bona fide visitors, including approved contractors, and external organisations who have made the necessary arrangements through the College's estates team.

The College will not permit the promotion on its premises of any events or activities which are planned to take place off-site which might draw people into terrorism. The College reserves the right to determine the suitability of promotional materials relating to external events and activities and to withdraw such materials where it considers them to be inappropriate.

Online safety

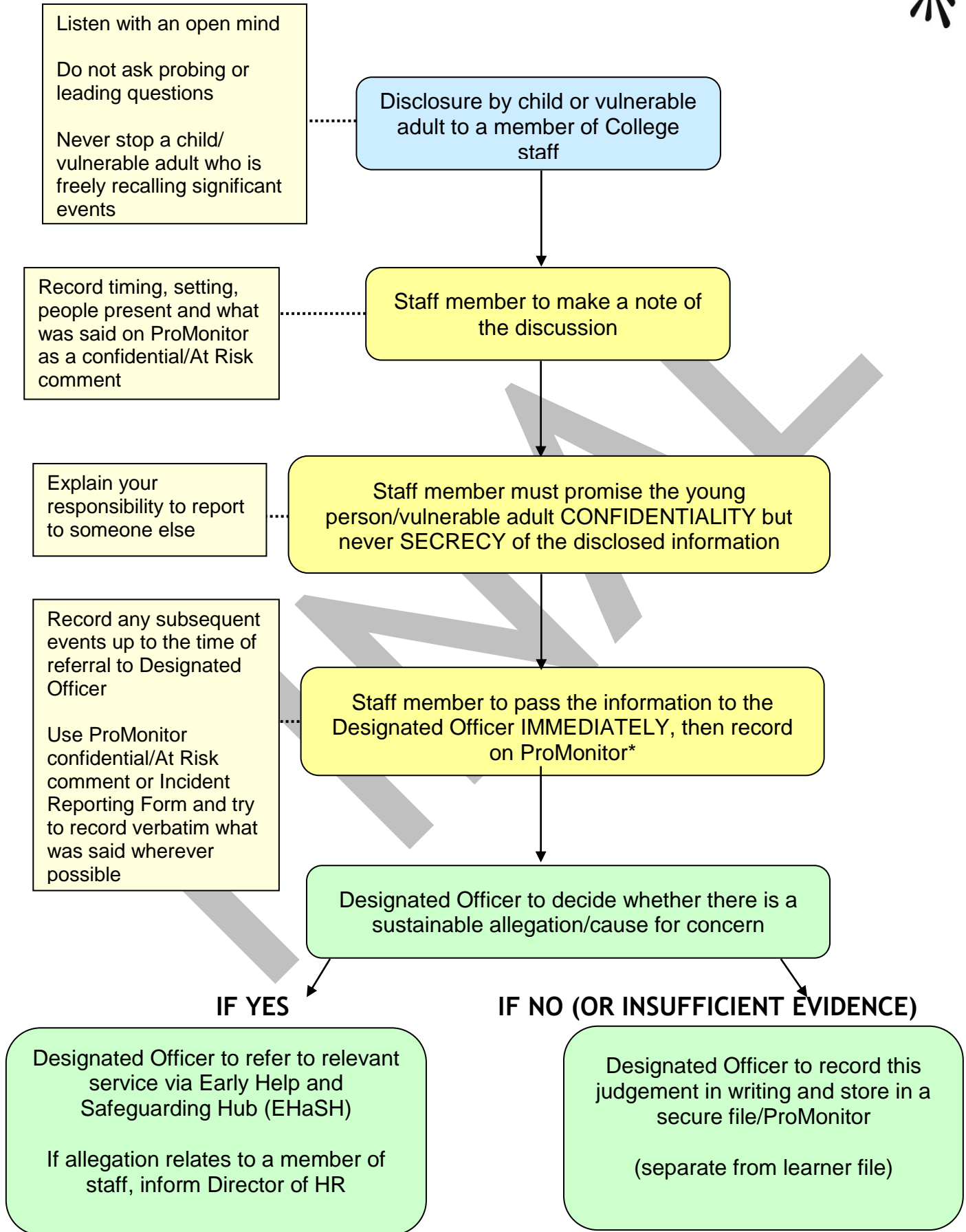
The College will maintain rigorous arrangements, including a robust fire wall and web filters, to prevent members of the college community from accessing on-line materials which have the potential to draw people into terrorism.

REPORTING AND MONITORING

The implementation of the Policy and the effectiveness of College's safeguarding arrangements will be monitored by the College's Safeguarding group which meets termly and is chaired by the Assistant Principal. Internal and external referrals will be reported annually to The College Executive Team and the Board of the Corporation, and compliance with the Prevent Duty will be reported within the College's annual equality report. The policy shall be subject to annual review.



SAFEGUARDING PROCEDURE



NOTE: In exceptional circumstances, any member of staff may make a direct referral to EHaSH, however the Designated Officer must be informed as soon as possible. *Tutors with concerns relating to FGM must make a referral directly to the police via EHaSH, with support from the Designated Officer.

Appendix 1: External Speaker/Guest Speaker Checklist

To be completed by the member of staff coordinating the visit of the External speaker/Guest.

1a. Member of staff coordinating visit:	
1b. Name of external speaker(s)/guest(s):	
1c. Organisation represented by external speaker/guest:	
1d. Address of organisation represented by external speaker/guest:	
1e. Telephone number of organisation represented by external speaker/guest:	
1f. Topic/subject to be covered:	
1g. Date(s) of visit:	
1h. Location(s) of visit:	
1i. Resources to be used:	
1j. Tutor(s) or other College staff member(s) to be present during the event:	

I confirm that:

- I have verified the name and address of the organisation represented
 - I have reviewed the resources to be used and can confirm suitability
 - I have concerns and wish to refer the decision to the Assistant Principal
- (Please complete box 2a)*

Signature:	Date:
Signature of line manager:	Date:

Referral to Assistant Principal: Information, Planning, Learner Experience, Inclusion and Curriculum Operations

2a. Reason for referral:	
2b. Approved/ Rejected:	
2c. Reason for rejection:	
Signature of Assistant Principal: Information, Planning, Learner Experience, Inclusion and Curriculum Operations:	Date:

Please forward completed Checklists to Anne Farley.

FINAL