

# Safeguarding and Protecting Children and Vulnerable Adults Policy

Date Policy Last Approved	Review Frequency	Approving Body	Date of next Review
Mar 2018	Annually	Board of Trustees	Mar 2019

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YMCA enables people to develop their full potential in mind, body and spirit. Inspired by, and faithful to, our Christian values, we create supportive, inclusive and energising communities, where young people can truly belong, contribute and thrive.

SUPPORT & ADVICE

ACCOMMODATION

FAMILY WORK

HEALTH & WELLBEING

TRAINING & EDUCATION



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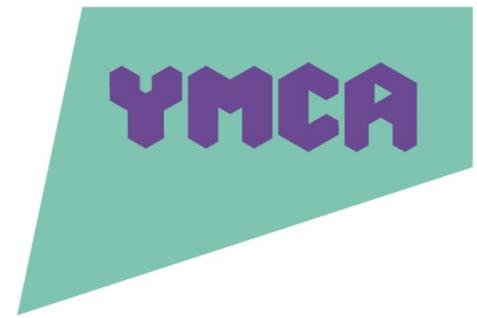
**Appendix 1: Guidance for staff, volunteers and partners dealing with Disclosures of Abuse and Procedures for Reporting Concerns**

**Responsible Officers:**

**Executive Lead: CEO / Principal**

**Designated Head of Safeguarding: Head of Department, FE Education and Apprenticeship**

**Deputy Head of Safeguarding: Head of Department, HE Programmes**



## **1. INTRODUCTION**

What is Safeguarding?

The term safeguarding children has been variously defined. For example:

“Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about children and people’s welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies”.<sup>1</sup>

Under the Education Act 2002 Governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children.

Colleges and their staff form part of the wider safeguarding system for young people. This system is described in statutory guidance Working Together to

Safeguard Children<sup>2</sup>.

Information included in this document includes elements, which have been lifted

from the main statutory guidance, Keeping Children Safe in Education.<sup>3</sup>

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<sup>1</sup>Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children 2002

<sup>2</sup> Department for Education Guidance - Working Together to Safeguard Children, March 2015

This document provides statutory guidance from the Department for Education issued under Section 175 of the Education Act 2002. The College is committed to creating and maintaining a safe and positive environment for all children and vulnerable adults and fully recognises its responsibility to help safeguard the welfare of learners and protect them from harm.

The welfare of children and vulnerable adults is paramount and the College takes seriously its duty to safeguard and promote the welfare of learners in its care.

## **2. BACKGROUND**

The majority of the College's learners are over the age of 18 however, research suggests that around 10% of children will suffer some form of abuse and disabled children are three times more likely to be abused. Due to their day to day contact with learners, some of whom may be vulnerable adults themselves, College staff are uniquely placed to observe changes in a learner's behaviour and the outward signs of abuse. Learners may turn to a trusted adult in College when they are in distress or at risk. It is vital that College staff are alert to the signs of abuse and understand the procedures. All staff are required to execute their duties professionally and with care and report their concerns.

The College will take appropriate action against staff breaking safeguarding regulations or the Staff Code of Conduct.

The College will refuse admission or withdraw from programme anyone who may pose a risk to others.

Section 175 of the Education Act 2002 places a duty on corporations of further education colleges to make arrangements for carrying out their functions with a view to safeguarding and promoting the welfare of children. It also requires Corporations to have regard to any guidance issued by the Department for Education (DfE) in drawing up these arrangements.

Keeping Children Safe in Education DfE (2015) and The Counter Terrorism and Security Act, (2015) provide statutory guidance to

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<sup>3</sup> Department for Education - Keeping Children Safe in Education: Statutory Guidance for Schools & Colleges, September 2016

schools and colleges in carrying out their safeguarding duties including the responsibilities of Governors, giving due regard to advice support and guidance provided by the Local Authorities and other agencies

This Policy states how the College will ensure these duties are carried out.

### **3. POLICY STATEMENT**

The YMCA George Williams College has a statutory and moral duty to ensure that the College promotes the welfare of young people and vulnerable adults receiving education and training in the College; or under the auspices of the College. Where reference is made to 'children' and/or 'young people' the term is used to mean those under the age of 18. The College recognises that some adults are also vulnerable to abuse and the procedures have been developed to apply to the protection of vulnerable adults and allegations of abuse of this nature. The College is committed to ensuring:

- A safe environment for young people and vulnerable adults to learn in;
- That young people and vulnerable adults who are suffering, or are likely to suffer significant harm are identified;
- That we will take appropriate action to see that such young people and vulnerable adults are kept safe at the College; and
- Appropriate measures are implemented to keep learners safe from radicalisation and promote British values.

To achieve these aims the College will annually review the policy and procedure with the aim of:

- Raising awareness of issues relating to the welfare of children, young people and vulnerable adults and the promotion of a safe environment for them to learn within the College;
- Aiding the identification of children, young people and vulnerable adults at risk of significant harm, providing procedures for reporting concerns;

- Discharging the institutions statutory duties with regard to the PREVENT strategy;
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff; and
- The safe recruitment of staff In developing the policy and procedure the College will consult with, and take account of, guidance issued by the Department for Education and other relevant bodies and groups.

The College will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to Social Services or other appropriate agencies.

The College has links with the Local Authority for Safeguarding Matters. Appropriate College staff will contact the Safeguarding Team or Social Care staff as required. They have full knowledge of the local authority safeguarding procedures and have contact with the Local Authority Designated Officer (LADO).

The College will have a nominated Governor for safeguarding issues who will have undertaken appropriate training.

The Principal/CEO and all staff working with children young people and vulnerable adults will receive training adequate to familiarise them with safeguarding issues and their responsibilities within the College policy and procedures; with refresher training at least every three years. A member(s) of the Senior Management Team will have special responsibility for safeguarding issues.

The CEO/Principal is the Executive Safeguarding Lead. The Designated Senior Safeguarding Officer who has lead responsibility for safeguarding in the College is Head of Department, FE Programmes and Apprenticeships. Senior managers will ensure that there is a mechanism in place to assist staff to understand and discharge their responsibilities in respect of Safeguarding young people and vulnerable adults. Staff will ensure that they receive regular Safeguarding updates. The governing body will receive an annual report from the Senior Designated Safeguarding Officer who reviews how the duties have been discharged.

Additionally, the College notes and draws to the attention of the Staff the criminal offences that may be committed in connection with the welfare of children/vulnerable adults, in particular those involving abuse of trust which prohibit staff from engaging in or encouraging sexual activity with students who are under the age of 18 or vulnerable.

These have been codified in the Sexual Offences Act 2003 (Sections 16-24). 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.

The College abide by and follow all relevant legislation that assist in keeping young people and vulnerable adults safe and free from risk of harm. In particular relevance is given to the Mental Capacity Act 2005 which where applicable (project dependents) incorporates the Deprivation of Liberty Safeguards DoLS.

#### **4. DEFINITIONS**

- ‘Child’ means a person under 18 years of age.
- ‘Vulnerable Adult’ means an adult (a person aged 18 or over) who is or may be in need of community care services by reason of mental or other disability, age, 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.
- ‘Staff’ means all those working for or and on behalf of the College, full time or part time, this includes agents of the College and associates.
- ‘The College’ means YMCA George Williams College.
- ‘Designated Safeguarding Officer (DSO)’ means the person with lead responsibility for Child Protection and Safeguarding issues, in this case the Head of FE Programmes and Apprenticeships.
- The Executive Head of Safeguarding means the person with overall responsibility for Safeguarding, in this case the CEO / Principal
- ‘DBS’ means Disclosure and Barring Service
- ‘LADO’ means the Local Authority Designated Officer or Allegations



Manager

- 'MASH' Multi Agency Safeguarding Hub

## **DEFINITIONS OF ABUSE**

The College recognises the following as definitions of abuse:

### **a. Physical Abuse**

Physical abuse causes harm to a young person or vulnerable adult. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

### **b. Neglect**

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

### **c. Sexual Abuse**

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

### **d. Emotional Abuse**

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the vulnerable adult or young person's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive electronic communications.

## **5. ROLES AND RESPONSIBILITIES**

### **a. Designated Staff with Responsibility for Safeguarding.**

The Designated Senior Safeguarding Officer with lead responsibility for safeguarding issues is Head of Department for Further Education

Programmes and Apprenticeship. They have 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 within the College and in outreach situations.

This person is a senior member of the College management team. They have a key duty to take lead responsibility for raising awareness across all staff of all issues relating to the welfare of children, young people and vulnerable adults learning within the College.

The DSO has received training in safeguarding issues and inter-agency working, and will receive refresher training at least every two years. She also has specific additional training focused on the PREVENT strategy and aspects of FGM, Forced Marriage and so-called Honour Based Abuse.

The DSO is supported in her Safeguarding responsibilities by all other appropriate staff.

Responsibilities include:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies;
- Providing advice and support to other staff on issues relating to safeguarding;
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral);
- Ensuring that parents of children and young people within the College are aware of the College's safeguarding policy, even if they are visitors to the College;
- Liaising with the Local Authorities and other appropriate agencies;
- Liaising with employers and training organisations that receive children or young people from the College on long term placements to ensure that appropriate safeguards are put in place;
- Ensuring that staff receive basic training in safeguarding issues appropriate to their roles and are aware of the College safeguarding procedures; and
- The designated senior member of staff will provide an annual report to the governing body setting out how the College has discharged its duties. She is responsible for reporting deficiencies in procedure or policy identified to the governing body at the earliest opportunity.

**b. Other Staff Members.**

Other members of staff with specific responsibility for safeguarding issues are:

- All of the SET

These designated staff:

- Report to the Principle and DSO with Safeguarding responsibility;
- Know how to make an appropriate referral within the College, and to whom to make it to;
- Are available to provide advice and support to staff on issues relating to safeguarding;
- Are available to listen to children, young people and vulnerable adults studying in the College;
- Deal with individual cases, including attending College case conferences and review meetings as appropriate; and
- Have been trained in safeguarding issues and receive refresher training at least every two years.

### **c. Designated Governor.**

The designated governor is responsible for liaising with the Principal and Senior Designated staff member with lead responsibility over matters regarding safeguarding including:

- Ensuring the College has procedures and policies in place, which are consistent with guidelines;
- Ensuring the governing body considers the College policy on Safeguarding each year; and
- 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 is responsible for overseeing the liaison between agencies, e.g. police and social services, and the Chair of Governors in connection with allegations against the Principal or the Senior Designated staff member with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good



communication between the parties and provide information to assist enquiries.

To assist in these duties, the designated governor shall receive appropriate training.

## **6. MANAGEMENT OF VISITORS**

Visitors to the College are to be directed to the Reception area. The member of staff meeting visitors is required to enter the visitor's name in the Visitors' Book held at the Reception counter. The visitor will be issued with an identification badge, which must be worn at all times whilst on College premises. Visitors must be met at the Reception area by a member of staff and accompanied to the arranged activity by them. On completion of the activity, the visitor should be accompanied back to Reception to facilitate them being booked out and returning their visitor's badge.

Staff are encouraged to make their visitors aware of the necessary emergency procedures on arrival at the College and to ensure they are provided with a Safeguarding leaflet. Reception staff must receive prior notification of visitors in order to provide the appropriate response.

## **7. RELATED POLICIES, PROCEDURES AND DOCUMENTS**

The College has established recruitment and selection procedures for staff that support safeguarding and promote the welfare of young people. These procedures ensure that the College has robust background checks to assess the suitability of applicants to work in an environment of young people and vulnerable adults. The recruitment and selection procedures are reviewed annually and meet the criteria for safe recruitment and address the legislative responsibilities overseen by the Disclosure and Barring service.

As previously mentioned above the College's Safeguarding Policy and Procedures are based on the principles contained within both UK and international legislation and Government guidance. Also taking into consideration the following:

- DfE Guidance - Working Together to Safeguard Children, March 2015
- DfE - Keeping Children Safe in Education: Statutory Guidance for Schools & Colleges, September 2016
- Home Office – Multi-Agency Statutory Guidance on FGM, April 2016

The College's Safeguarding and Protecting Children and Vulnerable Adults Policy, should be read in conjunction with the following:

- i. Student Bullying and Harassment Policy
- ii. Additional Support Policy
- iii. Equality, Diversity and Inclusion Policy
- iv. Supporting students with medical needs policy
- v. Health and Safety Policy
- vi. Student Disciplinary Policy and Procedure
- vii. Staff Disciplinary Policy

Management of Allegations Against Staff and Volunteers Policy

- viii. Social Media Staff Use Policy
- ix. Personal and Professional Relationships at Work Policy
- x. Acceptable ICT Usage Policy
- xii. Data Protection Policy
- xiii. Staff Grievance Procedure
- xiv. Placement Vetting Procedure
- xv. Safer Recruitment Policy
- xvi. Staff Code of Conduct
- xvii. YMCA George Williams College Prevent Strategy
- xviii. DBS Policy

## **8. DEALING WITH A DISCLOSURES OF ABUSE AND THE PROCEDURE FOR REPORTING CONCERNS**

Where a young person/vulnerable adult discloses abuse to a member of staff the member of staff should report the disclosure to one of the designated safeguarding staff within 2 hours (and must do so within 4 hours) of hearing the allegation. Failure to do so may result in disciplinary action. They should also make a record using the report form on the intranet.

If a child/vulnerable adult tells an associate 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 statutory guidelines.
8. Concerns relating to possible abuse by a member of Staff must be reported immediately to the Principal with overall responsibility, who will liaise with the DSO.

To reiterate: your responsibility is to

1. 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
2. Provide reassurance to the child/vulnerable adult, not promise confidentiality, as you will need to pass on any information given

3. Pass on the information, not make the decision that it isn't worth taking seriously
4. Believe the person but not interview anybody yourself. If a crime has been committed this will contaminate the evidence and lose a possible prosecution
5. Preserve any evidence and record everything seen and heard
6. Follow up any verbal report with confirmation in writing
7. Be prepared to co-operate fully with any formal investigation

#### Allegations against Staff:

In rare instances, staff in educational institutions has been found to be responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations made against them. The College recognises that an allegation of child abuse made against a member of staff may be for a variety of reasons and that the facts of the allegation may or may not be true.

The College recognises that the Children's Act 1989 states that the welfare of the child is of paramount concern and will deal with any allegations of this nature sensitively and will act in a careful and measured way.

Where an allegation is made about another member of staff the allegation should be reported as stated above immediately to the Principal. In the first instance, the Principal, or where the Principal is the subject of an allegation, the Chair of Governors, in the role of 'case manager' should immediately discuss the allegation with the Designated Senior Safeguarding Officer. The purpose of this initial discussion is for the safeguarding manager and the case manager to consider the nature, content and context of the allegation and agree a course of action.

The Safeguarding Designated Officer may be required to provide or obtain relevant additional information, such as previous history, whether the young person or their family have made similar allegations previously and the individual's current contact with children.

There may be situations where there will warrant the involvement of the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the safeguarding manager in order to help determine whether police involvement is necessary.

If it is agreed an internal investigation should take place the Designated Safeguarding Officer will:

- Inform the child/children or parent/carer making the allegation that the investigation will take place and what the likely process will involve;
- Ensure that the parents/carers of the child making the allegation have been informed that the allegation has been made and what the likely process will involve;
- Make arrangements to inform the staff member against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve, including considering, with the Human Resources staff, if a period of suspension from work is warranted;
- Where a strategy discussion is needed, or police or children's social care services need to be involved, advise the case manager not to inform the staff member until those agencies have been consulted, and have agreed what information can be disclosed to the accused.
- Inform the Chair of Governors of the allegation and the investigation; and keep a written record of the action taken in connection with the allegation.

The investigation and any action arising from the investigation will be conducted in accordance with the existing staff disciplinary procedures. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed of the College's statutory duty to report Safeguarding concerns under the Disclosure and Barring Services Barred Lists procedures.

As a result of any investigation of this nature the Designated Safeguarding Officer will review the process and identify whether there are any matters arising from it that could lead to the improvement of the College's procedures including training needs of staff, and report



any recommendations to the Principal and governor with lead responsibility for safeguarding.

**Where the allegation is considered to be either a potential criminal act or indicates that the child/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the police.**

Other potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of Staff and is neither potentially a crime nor a cause of significant harm to the child/vulnerable adult. The matter should be addressed in accordance with the College disciplinary procedures.

The allegation can be shown to be false because the facts alleged could not possibly be true.

## **9. TRAINING FOR VOLUNTEERS**

The College recognises that some individuals wish to gain work experience or contribute to the community through unpaid volunteering activities from time to time. Whilst the College generally supports the opportunities that volunteering potentially provides to both parties, it is important that appropriate consideration is given to the suitability of the volunteer in relation to the voluntary work provided, and that all relevant safer recruitment checks are carried out in advance of the commencement of voluntary work. The standard recruitment process will be used to approve a voluntary work opportunity, and ensure the suitability of the volunteer worker.

Whilst volunteers undertaking unpaid work are under no obligation to provide services to the College, they will be asked to sign a Volunteer Handbook prior to commencement, which sets out the expectations that the College has and the basis upon which the voluntary work is provided.

As part of the College's expectations volunteers will be required to undertake induction and familiarisation, mandatory training, including: Safeguarding &

PREVENT; Health & Safety; and Equality & Diversity.



## **10. MONITORING AND REVIEW**

All College staff and Board Members will undergo the College's mandatory safeguarding training. In addition, all staff and Board Members will receive safeguarding and child protection updates (e.g. via email, e-bulletin, staff meetings etc.), as required, but at least annually. Specific training for Designated Contacts will be provided separately and updated every two years.

The College will ensure that it has policies and procedures which are consistent with Government guidance; this includes following procedures as set out by Local Safeguarding Children Boards.

The effectiveness of this Policy will be ensured through, annual review of the Safeguarding Policy by the Board. Informing the Board annually as to how staff have complied with the Policy; this will include termly/annual reports. Maintaining a single central record of all staff and volunteers.

The Safeguarding Task Force will guide and monitor the College's work via termly meetings and safeguarding and prevent action plans. The task force will include a link Board Member of the Board of Governors.

This Policy will be reviewed annually, or as otherwise directed by the Principal, or legislative changes and should be read in conjunction with safeguarding process and procedures and The Staff Code of Conduct. Staff from all areas of the College will be consulted as part of this process.

### **Appendix 1: Guidance for staff, volunteers and partners dealing with Disclosures of Abuse and Procedures for Reporting Concerns**

If a learner tells you that he/she has been physically, sexually, emotionally or psychologically abused in any way you should:

1. Listen to their story without any prompting or leading questions.

2. Reassure the learner that what they are telling you is being taken very seriously.

Do not promise the learner that what they are telling you will be kept totally confidential. Explain that in order for you to help them you will need to discuss what you have been told with a designated Safeguarding member of staff.

Q What are some of the symptoms of child abuse?

It must be stressed that every young person or vulnerable adult is different and symptoms will vary from individual to individual.

A If abuse starts happening to a young person or vulnerable adult their behaviour is likely to change, a calm person may become loud and disruptive; a lively person may become quiet and withdrawn.

The young person or vulnerable adult may:

- Present with bruises and injuries that they have difficulty explaining or that are in places where it is difficult to hurt yourself accidentally, i.e. neck, cheeks, eyes, shoulders and the top of the arms
- Be scared, tearful and may present unusual, difficult or strange behaviour
- Self-harm or place themselves in risky situations, even attempt suicide

Q What if a young person or vulnerable adult tells you that they are being abused?

A Take them seriously; it will have taken a lot of courage to tell someone.

Reassure them that they have done the right thing in telling someone. Do not promise to keep what they tell you a secret, if the young person/vulnerable adult ask you to, tell them that you may have to tell someone else to get further help and to keep them safe. Thank them for telling you and follow the procedures.

Q What if you suspect a young person or vulnerable adult is being abused?

A It is not your job to establish whether or not the young person or vulnerable adult is telling the truth. It is your job to pass on your concerns:

- Listen carefully and stay calm;
- Do not interview the young person, but question normally and without pressure, in order to be sure you understand what you are being told;
- Write down what is being said using the young person's words;
- Do not put words into the young person's mouth;
- Reassure them that by telling you, they have done the right thing;

Stress that information given will be treated confidentially and inform the young person that you must pass the information on but that only those who need to know about it will be told. Inform them of to whom you will report the matter.

Ensure that the parents or carers are kept informed – notwithstanding the above you should not investigate concerns or allegations yourself but should report them immediately to one of the College Safeguarding members of staff.

All information disclosed to you should be treated as confidential and must not be passed on to personal tutors or other College employees, except within the College Safeguarding structure.

Where concerns and or allegations involve a member of staff you should report them immediately to the senior member of staff with lead responsibility for Safeguarding, or the Principal.

If for any reason you feel unable to raise an issue with College managers or where you perceive that your genuine concerns are not

being addressed, you should follow the College Group Whistleblowing procedures. As a last resort, where internal channels might be inappropriate the government backed NSPCC Whistleblowing Helpline is available from 08:00 to 20:00, Monday to Friday, on 0800 028 0285.

Out of hours you can use their email address: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

You can also write to:

NSPCC

Weston House

42 Curtain Road

London

EC2A 3NH