

## Policy and Procedure

### POLICY

#### BACKGROUND

Richmond Adult Community College (RACC) is committed to safeguarding and promoting the welfare of all of its students. RACC seeks to ensure that the College is a positive environment for all learners to learn, work and socialise, and works with the London Borough of Richmond upon Thames to implement best practice in the safeguarding of children and vulnerable adults in line with the pan London guidelines.

Although RACC is predominantly an adult college, young people actively participate in provision. The College also has a large provision for adult learners who have a learning difficulty, disabilities and complex needs.

RACC recognises that learners within the safeguarded group face an ever-present risk of abuse. It is the duty of every member of staff to prevent abuse and to take effective action when abuse is suspected or disclosed.

#### COLLEGE COMMITMENT

Abuse is unacceptable in all circumstances.

The best defence against abuse is the strength of values incorporated in the College's culture. The College believes that all learners are entitled to be treated with dignity, courtesy and respect regardless of their age, race, gender or ability.

Safety is embedded within good sound practice and the growing ability of learners to protect themselves, make their views known and be listened to.

RACC will report all allegations of abuse to the LBRuT Children or Adult and Community Services team. If the report involves an allegation of a criminal act, a report will also be made to the Police and the college will fully co-operate with any investigations they carry out. The College will act on reports of alleged abuse whether they are recent, are reported to have taken place in the past, whether they have taken place on college premises or within the community.

College employees are in a position of trust and any betrayal of this trust will be viewed most seriously. Therefore any employee suspected of abuse will be subject to the College's disciplinary procedures. All employees have a duty to report abuse and failure to do so is a serious abdication of responsibility and will result in disciplinary action.

#### AIMS OF THE POLICY

- To prevent abuse by providing teaching and learner support which establishes a safe environment where students can learn in confidence, independence and feel listened to;
- To raise awareness of both teaching and business support staff of the need for the safeguarding children and vulnerable adults and of their responsibilities in identifying and reporting possible cases of abuse;
- To provide positive adult role models by ensuring that staff behaviour is professional at all times;

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

- To develop a structured internal procedure to be followed by members of the College community in cases of suspected abuse;
- To emphasise the need for good levels of communication and information sharing between all members of staff;
- To provide a systematic means of monitoring learners known or thought to be at risk;
- To promote understanding and build relationships with other agencies in order to develop multi-agency working and information sharing;
- To ensure the College practises safe recruitment of staff and volunteers;
- To prepare young people/children to operate safely within an adult environment to ensure that they have the skills and knowledge to stay safe;
- To ensure that learners know that there are Safeguarding Officers whom they can approach if they are worried or in difficulty;
- To provide appropriate support to staff and volunteers through supervision and training;
- To assess risk in relation to all College activities, focussing on prevention and minimising risk and putting in place safeguards;
- To ensure staff keep a written record of any injury or incident that caused harm along with any steps taken;
- To ensure staff and volunteers keep a professional distance and do not share personal information/email addresses/telephone numbers with young people;
- To equip learners within the safeguarded group with the skills and knowledge to identify positive life choices and to assert their preferences.

### LEARNERS WITHIN THE SAFEGUARDED GROUP

#### Child/Young Person

For the purposes of this policy, a young person is defined (Children Act 1989 and 2004) as anyone who has not yet reached his/her 18th birthday.

#### Vulnerable Adult

For the purposes of this policy, a vulnerable adult is defined as a person of 18 years and over who is 'at risk of experiencing neglect or abuse, and is eligible for community care services by reason of mental or other disability, age or illness and is or maybe unable to take care of him or herself, or able to protect him or herself against significant harm or exploitation.' (No Secrets, Department of Health 2000.)

#### Abuse

Abuse is defined as 'a violation of an individual's human and civil right by any other person or persons' (No Secrets, Department of Health 2000). It recognises seven types of abuse:

1. Physical abuse, including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
2. Sexual abuse, including rape or sexual assault or sexual acts to which the adult has not consented, or could not consent to, or was pressured in to consenting.

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

3. Psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
4. Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
5. Neglect and acts of omission, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
6. Discriminatory abuse, including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.
7. Institutional abuse, demonstrated by repeated instances of neglect, poor care, management and/or professional practice

Abuse is difficult to assess; many situations may involve a combination of abusive elements.

## PREVENTION

The College employs various strategies to control the risk of abuse and target the causes and opportunities for abuse and neglect. These include:

- Communication with the College community about the nature of abuse and College safeguarding activity
- Embedding the principles of safeguarding into management expectations and professional practice
- Joint training for College employees and employees of partner organisations
- Awareness raising training for all College employees
- Learner/activity risk assessments prior to the start of learning programmes
- Training for young people and adults who may be at risk of abuse on personal safety, health and wellbeing
- Monitoring local reports of abuse and researching their causes

### Targeted Prevention

Prevention strategies are specifically targeted at staff working with children/young people and/or adults at risk. This is because research shows that a significant number of abuse incidents involve professionals, carers and service managers.

Targeted Prevention Strategies include:

- Employee Recruitment
  - a CRB Enhanced Disclosure will be obtained for all new and existing appointments (current staff members have checks repeated every four years) to the College's workforce;
  - an up to date single central record will be maintained, detailing a range of checks carried out on College staff;

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

- anyone appointed to the College workforce who has lived outside the UK will be subject to additional checks as appropriate;
  - the College will ensure that contract/agency staff have undergone the necessary checks and have been made aware of this policy;
  - identity and employment history checks will be carried out on all appointments to the College workforce before the appointment is made.
- Policies and Procedures Employees are Expected to Follow. The College reinforces expectations of employees through rules for conduct and practice which, if broken, could lead to disciplinary action.
- Employee Training and Induction. On joining the organisation and when necessary thereafter, employees are provided with training regarding professional standards, policy and procedures and how to address the possibility of abuse.
- Employee Supervision and Support. All employees working with learners who may be at risk of abuse or neglect receive specialist training and regular supervision sessions from their line manager where they are supported in reflecting on their practice and areas for improvement.

### Safe Practice

Safe working practice ensures that students are safe and that all staff:

- are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- work in an open and transparent way;
- work with other colleagues where possible in situations open to question;
- discuss and/or take advice from College management over any incident which may give rise to concern;
- record any incidents or decisions made;
- apply the same professional standards regardless of gender or sexuality;
- are aware of the confidentiality policy;
- are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

### ROLES AND RESPONSIBILITIES

The **Governing Body** will ensure that:

- the College has a safeguarding policy and procedures in place that are in accordance with the appropriate Local Safeguarding Board and locally agreed inter-agency procedures, and the policy is made available to parents/carers on request;
- the College has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures;
- they remedy, without delay, any deficiencies or weaknesses regarding safeguarding arrangements;
- a governor is nominated to be responsible for safeguarding who will provide an overview and scrutiny and take action in the event of allegations of abuse being made against the Principal;

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

- they review their policies and procedures annually and provide information to the appropriate Local Safeguarding Board about them and about how the above duties have been discharged as required.

The **Principal** will ensure that:

- the policies and procedures adopted by the Governing Body are fully implemented, and followed by all staff;
- the safeguarding policy is updated and reviewed annually and work with the Governing Body regarding this;
- the College operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with young people and vulnerable adults;
- Safeguarding Officers are in place;
- staff undertake appropriate safeguarding training;
- sufficient resources and time are allocated to enable the designated person/s and other staff to discharge their responsibilities; and
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to safeguarding, and such concerns are addressed sensitively and effectively in a timely manner where services or activities are provided on the College premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding and liaises with the College on these matters where appropriate.

The **Vice-Principal (Curriculum and Quality)** will:

- act as a source of support , advice and expertise within the educational establishment;
- liaise with the Principal to inform her of any issues and ongoing investigations and ensure there is always cover for the role of Safeguarding Officers;
- refer cases of suspected abuse or allegations to the relevant investigating agencies;
- ensure that the curriculum covers how to keep safe and how to use the Safeguarding procedures;
- ensure that all staff have access to and understand the College's Children and Vulnerable Adults Safeguarding Policy;
- ensure that all staff have induction training;
- ensure parents, guardians or named responsible adults are made aware of the policy which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later.

The **Safeguarding Officers** will:

- recognise how to identify signs of abuse and when it is appropriate to make a referral;
- Represent RACC at the Richmond-upon-Thames Safeguarding Children Board/Adult Safeguarding Board as required and have a working knowledge of how to operate and conduct a child protection case conference and be able to attend and contribute to these;
- keep detailed, accurate and secure written records and/or concerns;
- undertake investigations as directed by the Vice-Principal(Curriculum and Quality);

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

- obtain access to resources and attend any relevant or refresher training courses at least every two years;
- As part of the Safeguarding Team, plan and implement training for young people and vulnerable adults on staying safe at the College.

### All staff and volunteers will:

- work in an open environment, where possible avoiding private and unobserved situations;
- treat all students fairly with dignity and respect;
- not share personal information and personal e-mail addresses/facebook friends/personal mobile;
- keep a written record of any injury or incident (including verbal attacks) along with any steps taken;
- fully comply with the College's policies and procedures, including their line manager of any injury or incident;
- attend appropriate training;
- be alert and vigilant to indicators of abuse;
- report all concerns or possible indicators of abuse to a college Safeguarding Officer.

**It is the responsibility of all employees to be alerted to possible indicators of abuse and to raise concerns to a College Safeguarding Officer. Staff members may become aware of the possibility that abuse has occurred by witnessing an act, receiving a verbal report from a learner or member of staff or by suspicions raised by indicators listed in the guidelines associated with this policy.**

## CONFIDENTIALITY

Information about abuse must never be withheld intentionally (deliberately withholding information will lead to disciplinary action) as failure to disclose may have an influence on the future safety of an individual.

Disclosures and concerns should not be treated as confidential. Individuals who have made a disclosure should be informed of the next steps that will be taken and should be assured discretion.

If a learner lacks the capacity to consent (as prescribed in current legislation), the College will report the alleged abuse immediately in order to act in the best interests of the individual.

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

## Policy and Procedure

### PROCEDURE

This procedure is to be followed by all College employees, in accordance with the College's Safeguarding Children/Young People and Vulnerable Adults Policy.

Guidelines associated with this policy provide information on how to recognise abuse, and how to react to the suspicion or discovery of abuse, along with the key steps to be taken, their timescales, and useful references.

### **ALERTING OR RAISING CONCERNS**

#### **Alerting or Raising Concerns about Abuse Involves:**

- Recognising signs of possible abuse;
- Listening and responding to disclosures;
- Taking action, when necessary, to protect a young person or vulnerable adult and preserve evidence;
- Raising a concern by reporting a disclosure, concern or allegation to a Safeguarding Officer;
- Recording the event (SG1 Safeguarding Record of Concern).

The details of Safeguarding Officers are displayed at Reception at all College sites. Reports can be made in person, by phone or by e-mail.

### **REPORTING**

#### **Staff must immediately report:**

- any suspicion that a young person/vulnerable adult is injured, marked, or bruised in a way which is not readily attributable to normal activities;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a young person/vulnerable adult may have suffered harm (e.g. worrying emails, texts);
- any concerns that the young person/vulnerable adult may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that the young person/vulnerable adult is presenting signs or symptoms of abuse or neglect;
- any significant changes in a young person's presentation, including non-attendance;
- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to young person/ vulnerable adult.

**Reports can be made in person, in writing using form SG1 or by phone. The Safeguarding phone number is displayed at Reception at both sites and on the college website.**

Disclosures or information may be received from learners, parents or other members of the public. The College recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person and make a contemporaneous record.

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

### Policy and Procedure

Staff will not investigate but will, wherever possible, elicit enough information to pass on to a college Safeguarding Officer in order that s/he can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a young person/vulnerable adult may be at risk of harm
- clarify the information
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any person alleged to have harmed the young person
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate

### Safeguarding Officers

When a Safeguarding Officer is alerted to a concern they will immediately carry out an initial fact find in order to establish whether there is sufficient evidence to support further investigation of suspected abuse and will also consider:

- any urgent medical needs of the young person/vulnerable adults;
- making an enquiry to find out if the individual concerned is a child whether they are subject to a Child Protection Plan;
- discussing the matter with other agencies involved with the family;
- consulting with appropriate persons such as the Vice-Principal (Curriculum and Quality) to discuss referral;
- the learner's wishes.

If the fact find identifies that the allegation is not substantiated or does not involve abuse of a child/young person or a vulnerable adult, the Safeguarding Officer will make a written report of this fact to the Vice-Principal (Curriculum and Quality). Further action may be necessary to deal with the matter as a complaint, an issue of poor practice or a review of the child or vulnerable adult's Individual Learning Plan.

If the fact find identifies further cause for concern, the Safeguarding Officer will inform the Vice-Principal (Curriculum and Quality) and make a report to appropriate LBRuT Team and, if a criminal offence is thought to have taken place, the Police.

If a learner lacks the capacity to consent to a report (Mental Capacity Act 2005), the College will report the alleged abuse immediately in order to act 'in the best interests' of the individual.

The Safeguarding Officer will make a full written report (SG2 – Safeguarding Officers Report) to the Vice-Principal (Curriculum and Quality) and the Principal and Safeguarding Governor will be informed. This report

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

### Policy and Procedure

will be shared with Adult and Community Services and the Police and may be used in any criminal proceedings that may ensue.

It is important that victims of suspected abuse are made safe.

If the Safeguarding Officer has reason to believe that the learner may be at risk on leaving the College premises or when he/she returns home, the Safeguarding Officer will immediately contact the individual's Care Manager. If the individual is not known to be in receipt of care services or it is out of normal office hours, the Safeguarding Officer will contact the Social Services Adults or Children Emergency Duty Team as appropriate. The learner should be asked to remain at College until guidance has been received from the borough's Adult and Community Services or the Police.

### RECORDING AND MONITORING

Accurate records will be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

Information will be shared with partner agencies.

### Investigating Allegations of Abuse at College

In the event that the allegation of abuse involves a College employee, another learner or was reported to have taken place during a College activity or on a College site, the Safeguarding Officer will advise the Vice Principal (Curriculum and Quality) who will appoint an Investigating Officer to carry out an investigation in line with college disciplinary procedures to lead an investigation and establish whether:

- disciplinary action is necessary;
- professional practice needs to improve; or
- there are gaps or weaknesses in service provision;
- liaise with the Police, the Children and/or Adult and Community Services as necessary.

All information will be shared with the Children or Adult and Community Services teams and/or the Police in line with the Safeguarding Joint Working Protocol (2008).

If a criminal offence is alleged to have taken place, an investigation will be led by the Police or the appropriate social services team. The College will give full co-operation to any such investigations and will also carry out an internal investigation in line with College disciplinary procedures if appropriate.

Where the alleged perpetrator or witnesses are employees of the College and their continued presence at work may affect the process of the investigation or present a risk to the health and safety of learners or staff, the Principal or Vice Principal (Curriculum and Quality) may suspend relevant staff members from duty with immediate effect in order to ensure that the investigation be carried out quickly and effectively without the risk of those involved influencing the outcome.

Employees under suspension will be supported by the College's Human Resources team who will keep the employee informed of the progress of the investigation.

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

**ACTION FOLLOWING THE REFERRAL OF A SAFEGUARDING CONCERN TO AN EXTERNAL AGENCY**

The Safeguarding Officer will:

- make regular contact with the social worker/ case worker involved to stay informed;
- wherever possible, contribute to the Strategy Discussion;
- provide a report for, attend and contribute to any subsequent Child Protection Conference;
- if the child or young person is placed on the Child Protection Register, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences;
- where possible, share all reports with parents prior to meetings;
- where in disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a Child Protection Conference, discuss this with the Vice-Principal(Curriculum and Quality);
- where a child on the child protection register moves from the college or goes missing, immediately inform the key worker in the Children’s Services team.

**SUPPORTING THE YOUNG PERSON/VULNERABLE ADULT AND PARTNERSHIP WITH PARENTS AND CARERS**

- The College recognises that the young person or vulnerable adult’s welfare is paramount, however good protection practice and outcome rely on a positive, open and honest working partnership with parents and carers.
- Whilst the college may, on occasion, need to make referrals without consultation with parents or carers, RACC will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect the safeguarded learner.
- The college will provide a secure, caring, supportive and protective relationship for the young person/vulnerable adult.
- Young people and learners with learning difficulties will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why.

**ALLEGATIONS REGARDING PERSON(S) WORKING IN OR ON BEHALF OF COLLEGE (INCLUDING VOLUNTEERS)**

Where an allegation is made against any person working in or on behalf of RACC that he or she has:

- Behaved in a way that has harmed a young person/vulnerable adult or may have harmed a young person/vulnerable adult
- Possibly committed a criminal offence against or related to a young person/vulnerable adult or
- behaved towards a young person/vulnerable adult in a way that indicates s/he is unsuitable to work with young person[s]/vulnerable adult[s].

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes

### Policy and Procedure

Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained securely by the Safeguarding Officer. Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

### Learning from Mistakes and Improving Support and Services

All safeguarding incidents that happen at the College will be reported to the borough's Safeguarding Children Board or Adult Safeguarding Partnership Board. Support will be sought from Children's Services/Adult and Community Services in a Safeguarding Strategy Meeting that will take place within five working days of the report, unless additional time is agreed between the parties concerned. This is to ensure that any risks to the wellbeing of learners are effectively dealt with.

Details of all alerts, reports, investigations and subsequent actions will be reviewed monthly at the College Safeguarding Monitoring Team and reported monthly to Health and Safety Committee and termly to the Employment & Organisational Development Committee of the College's Governing Body.

Owner:	Gabe Flint	Approved by:	Governing Body
Review interval:	1 year	Approved on:	31 <sup>st</sup> March 2011
Date of next review:	March 2012	Post to website:	Yes