

1. Introduction

Staff at Hashtag The Wrd Limited (defined in this policy as “TheWRD”) fully recognise the responsibilities they have under The Care Act 2014, section 14.5 ‘Where someone is 18 or over but is still receiving children’s services and a safeguarding issue is raised, the matter should be dealt with through adult safeguarding arrangements.’ The six principles apply to further educational colleges or establishments. Also, the Mental Capacity Act (2005) requires there to be arrangements in place to safeguard adults at risk.

We also recognise that we have a duty to all children whom we may become aware of being at risk through families and friends of students and will fulfil our duties to respond to and report safeguarding issues appropriately. We define a child as anyone under the age of 18 and a vulnerable adult as anyone over the age of 18 but due to their circumstances may be at an increased risk.

TheWRD is committed to taking all reasonable steps to promote and safeguard the welfare of students engaged in any activity and pay close attention to, and work within the legislative safeguarding requirements documented in Keeping Children Safe in Education, and the statutory Prevent Duty. The Institute has a duty, under the Children Act 1989, to ensure its functions are carried out to promote and safeguard the welfare of children under the age of 18. The Institute also has a duty, under the Care Act 2014, to promote and safeguard the welfare of vulnerable adults.

TheWRD ensures that all staff are clear that safeguarding is everyone’s responsibility, and that all staff are aware of the signs and symptoms of abuse so that they are able to respond promptly and appropriately to safeguarding concerns. Where appropriate, TheWRD works with other professionals to ensure a coordinated response to safeguarding issues. This policy exists to ensure that TheWRD implements appropriate arrangements, systems and procedures to ensure that all staff have the right skills, means and resources to protect children and vulnerable adults from harm. TheWRD will endeavour to support those students through a range of mechanisms including a positive ethos where students feel secure and liaison with external agencies and expertise such as Social Services and other relevant support services.

Statutory Framework

In order to safeguard and promote the welfare of all, the Institute will act in accordance with the following legislation and statutory guidance:

- The Children Act 1989 and 2004
- The Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- The Care Act 2014
- Dealing with Allegations of Abuse Against Teachers and Other Staff
- Working Together to Safeguard Children July 2018
- Keeping Children Safe in Education – September 2020
- Procedures set out by the Local Safeguarding Children Board and Safeguarding Adults' Board

We work with our validating partners The Skills and Education Group and act in accordance with their safeguarding policy which is available here: https://skillsandeducationgroupawards.co.uk/wp-content/uploads/2017/12/SEG-Awards_Safeguarding-Prevent-Agenda-Policy-21-22.pdf

2. Roles and Responsibilities

TheWRD will:

- Ensure we have a designated lead professional who will be responsible for safeguarding issues and receive appropriate training and support for this role.
- Ensure all staff are aware of the systems which support safeguarding and explain these before the start of each cohort.
- Ensure all staff and relevant external parties know how to contact the designated members of staff and are fully aware of their roles.
- Ensure that all staff and relevant external parties understand their responsibilities in being alert to the signs of abuse and their responsibility for referring their concerns to the designated members of staff.
- Notify Social Services and/or other appropriate agencies if there is an unexplained absence of a learner who is on the child protection register.
- Notify Social Services and/or other appropriate agencies if there are any concerns about the welfare and safety of any students.
- Cooperate as required with their enquiries regarding safeguarding matters.
- Keep written records of concerns about students, even where there is no need to refer the matter immediately.

- Ensure that all records are kept securely in line with IT and data protection policies.
- Ensure strict adherence to procedures when an allegation of any kind concerning students is made against a member of staff.
- Ensure safe recruitment practices are followed.

All TheWRD staff and volunteers will:

- Make themselves familiar with this Safeguarding Policy and the accompanying appendix, which will be provided at induction and made available on the VLE and the main website.
- Read Part 1 of Keeping Children Safe in Education, which will be highlighted and made available for everyone (Direct contact staff must also read Annex A of KCSIE.)
- Be alert to the signs of abuse as detailed in this policy and act in accordance with it if a student presents with indicators of abuse.
- Report any concerns immediately to any Safeguarding Officers or the Designated Senior Lead for safeguarding and identify children/vulnerable adults who may benefit from early help.
- Raise concerns about poor or unsafe practice with the Designated Safeguarding Lead.
- Participate in annual safeguarding updates/training.
- Understand TheWRD's procedure for dealing with peer-on-peer abuse.

The Chief Executive will:

- Where appropriate, act as support to the Designated Safeguarding Lead in relation to their safeguarding responsibilities.
- Ensure that all appropriate procedures are in place at the start of each cohort's course.

The Designated Safeguarding Lead will:

- Act as the point of contact for all matters concerning Safeguarding in relation to students, coordinate action within TheWRD, and liaise with external agencies where appropriate.
- Monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner.
- Ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly.

- Act as a source of support, advice and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.
- Liaise with the Chief Education and Learning Officer to inform them of issues pertaining to Safeguarding and TheWRD's policies.
- Ensure that all those within TheWRD are familiar with TheWRD's Safeguarding Policy and Procedures, and that this is reviewed and updated annually.
- Ensure the Safeguarding Policy and Procedure is available publicly, and stakeholders are aware of the fact that referrals about suspected abuse or neglect may be made, and the role of TheWRD in this.
- Ensure that TheWRD complies with its responsibilities with regard to training staff on Safeguarding.
- Liaise with families and the appropriate child protection agencies on individual cases and make referrals to appropriate agencies in consultation with the Local Authority Designated Officer (LADO).
- Ensure that appropriate action is taken to exclude, refuse admission or employment, to any individual who may pose a risk to children or vulnerable adults.
- Ensure that all staff are aware of the early help that is available within TheWRD and externally and support staff to access this as appropriate.
- Organise Safeguarding inductions newly appointed staff, as well as staff training, refreshed with annual updates as required.
- Provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education.
- Refer a case to the Multi Agency Safeguarding Hub (MASH), when there are concerns about possible abuse and neglect.
- Refer a student to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups.
- Keep written records of concerns about students and abuse, even where there is no need to refer the matter immediately.
- Undertake appropriate training, every 2 years, relevant to the role of the Designated Senior Lead for Safeguarding and the Prevent Duty.
- Ensure that they receive regular training and updates on current safeguarding practice.
- Ensure that they follow up any safeguarding concerns reported to them, and that they are dealt with in a timely and professional manner.

- Make appropriate referrals to Social/Community Services and/or the Police, where there are concerns that the child or vulnerable adult is or may be, being abused.
- Notify the Local Authority Designated Officer of any allegations made against a member of staff and to instigate appropriate processes where appropriate.
- Ensure that students are taught about keeping themselves safe, in a way that is appropriate to their age and understanding.
- Ensure that any member of staff found not suitable to work with students, will be notified to the Disclosure and Barring Service (DBS) for consideration for barring.
- Ensure that there are procedures in place to handle allegations against Senior Staff.

The Chief Education and Learning Officer will:

- Be responsible for a single central record of all checks on staff, including agency staff and volunteers.
- Ensure that appropriate action is taken to refuse employment to any individual who may pose a risk to children or vulnerable adults.
- Ensure that risk assessments are completed for new staff that don't have a completed DBS check in place on commencement of employment.

The Prevent Duty Lead will also:

- Ensure training on the Prevent Duty for all new staff at TheWRD.
- Liaise with the Regional Prevent Duty Co-ordinator and Regional Counter Terrorism Police to discuss any concerns and make referrals as appropriate.

3. Staff Training, Support & Supervision

All staff will receive training in child protection and safe working practice. In addition, they will receive safeguarding and child protection updates as required, but at least annually. Training will also include members of TheWRD community not employed directly by TheWRD. Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities, this training will be updated annually. When staff join TheWRD, they will be informed of the safeguarding arrangements in place. All staff will be given a copy of this policy and Part 1 of Keeping Children Safe in Education (KCSIE) for the relevant year. All staff will receive induction in safeguarding children and vulnerable adults as well as an introduction to the Prevent strategy; and the role of the Designated Safeguarding Lead (including the identity of the Designated Safeguarding Lead and any deputies).

We recognise that staff working at TheWRD who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will therefore support such staff by providing supervision and to seek further support such as counselling or supervision as appropriate.

4. Types and Patterns of Abuse

Incidents of abuse may be one-off or multiple, and affect one person or more. Professionals and others should look beyond single incidents or individuals to identify patterns of harm, just as the Care Quality Commission does when it looks at the quality of care in health and care services. Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse. In order to see these patterns it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- Serial abuse in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse;
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse; or
- Opportunistic abuse such as theft occurring because money or jewellery has been left lying around.

Anyone may carry out abusive or neglectful acts, including:

- spouses/partners;
- other family members;
- neighbours;
- friends;
- acquaintances;
- local residents;
- people who deliberately exploit adults they perceive as vulnerable to abuse;
- paid staff or professionals;
- paid staff or professionals; and
- volunteers and strangers.

Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a care home or in college. It can take place when an adult lives alone or with others.

The Ten Types of Abuse and Neglect:

- **Physical abuse** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Domestic violence** – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- **Sexual abuse** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- **Financial or material abuse** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Discriminatory abuse** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour

such as hoarding.

Signs of abuse and neglect

Workers across a wide range of organisations need to be vigilant about adult safeguarding concerns in all walks of life including, amongst others in health and social care, welfare, policing, banking, fire and rescue services and trading standards; education, leisure services, faith groups, and housing.

GPs, for example and in particular, are often well-placed to notice changes in an adult that may indicate they are being abused or neglected.

Findings from Serious Case Reviews have sometimes stated that if professionals or other staff had acted upon their concerns or sought more information, then death or serious harm might have been prevented.

(See “Specific Indicators of Abuse”, Appendix 2).

Reactions to Abuse

The consequences of abuse may have profound effects on the adult involved. The person may:

- deny that abuse has occurred, even when there is evidence to the contrary,
- attempt to persuade others that an abusive relationship is normal,
- withdrawal from social activity, ranging from normal activities to total lack of communication,
- show increased agitation and anxiety, from attention-seeking behaviour to overly subservient behaviour,
- experience depression,
- experience confusion, characterised by a deterioration in a previously confident person,
- change their behaviour or personality suddenly and unexpectedly,
- demonstrate physical or verbal aggression, or become prone to over-reaction,
- demonstrate self-neglect, including the loss of self-esteem, deterioration in appearance, weight loss or erosion of personal confidence.

Making safeguarding personal

When abuse has been disclosed, reported or observed, it is important that the person be treated with dignity and respect and is involved fully in the discussions about them – making safeguarding personal for them. The Care Act states:

'.....engages the person in a conversation about how best to respond to their safeguarding situation.'

They have the right:

- to be listened to when they report abuse of themselves and/or others,
- to appropriate education/information in order to identify behaviour which constitutes abuse and the rights to informed decision-making and consequent risk,
- to have the investigation processed where possible through a timescale with which they can be comfortable,
- to privacy and confidentiality in the conduct of the investigation,
- to be assisted by an interpreter, advocate, relative or carer in giving information, or evidence, unless the evidence which is to be given is subject to separate rules, e.g. police procedures,
- where a person's capacity is compromised to have decisions made in their best interest,
- to expect arrangements to be made to promote safety and welfare in both the short and long term,
- to expect that the issues of power, coercion and intent on the part of the alleged abuser to the alleged victim are given particular attention,
- not to have to undergo repeated presentations of information/evidence, except as required in criminal proceedings,
- to be involved in decisions made as a result of the investigation,
- to not participate in the investigation,
- to have access to the police action for justice procedures where appropriate.

Desired Outcomes for the Individual

They:

- are safe from continuing harm and/or abuse
- feel that they have recovered from the abuse or neglect
- are empowered and able to manage their situations
- have their stated objectives and desired results met
- believe that their views, worries and wishes are taken seriously
- feel they haven't had to compromise their safety and wellbeing at the cost of having relationships with other people
- develop stronger networks that are also protective
- know how to take precautions against harm and how to keep safe
- know who to contact to find out information

- feel in control and not driven or controlled by the safeguarding adults process
- can get help from someone who is independent

Procedures - Actions to be taken to address safeguarding concerns

It is not the responsibility of anyone working in TheWRD to decide whether or not abuse has taken place. Staff members must raise all concerns with the designated person.

5. Designated Persons for Safeguarding Concerns

NAMES AND CONTACT DETAILS

Any allegation made against a member of staff or a volunteer should be reported to Will Cooper Director of Student Experience willcooper@thewrd.group, who will seek advice from the Chief Education and Learning Officer. In the event of an allegation being made against the Chief Executive Officer or Chief Learning and Education Officer, this should be reported, by the Designated Safeguarding lead (even if that means self referral by one of the above), to the Skills and Education Group.

If a disclosure of abuse is made by a learner, they should have the procedure that will be followed explained to them, and that it may not be possible for TheWRD to maintain confidentiality.

If a learner makes an allegation about another organisation this should be reported to the Designated Person at that organisation who will take appropriate action.

6. The Prevent Duty

The Prevent Duty forms Section 26 of the Counter-Terrorism and Security Act (2015), which places a statutory duty on 'specified authorities', including Education Providers, to have 'due regard to prevent people from being drawn into terrorism'.

TheWRD regards the Prevent Duty as part of its community safeguarding responsibilities to protect the welfare and safety of our students.

Should any member of staff become concerned that a student is exhibiting extremist beliefs or behaviours and/or that they are at potential risk of exploitation by radicalisers they must share these concerns with their Local Safeguarding Officer or line manager. Precautions will be taken to risk assess guest and external speakers as and when required to ensure learners are not exposed to extremism or extremist views inadvertently.

In exceptional circumstances, for example, in cases where there might be a risk of immediate harm to an individual(s) or a third party, it would be open to the Designated Safeguarding Officer, or a senior member of TheWRD, about the need for direct contact with other external authorities (see Appendix 3 for Prevent contact details).

7. Consent and the Sharing of Information

Informed consent of the learner should be sought and obtained. Consent must be freely given after the alternatives and consequences are made clear to the person from whom permission is being sought.

If the data is classified as sensitive data, the consent must be explicit, and specific detail of the processing should be explained, the types of data to be processed, the purposes of the processing and any specific aspects of the processing which may affect the individual e.g. disclosures.

Where an overriding public interest exists:

If informed consent has not been sought or sought and withheld, TheWRD must consider if there is an overriding public interest of justification for sharing the information to a third party organisation.

In making this decision and compliant with the Human Rights Act, The Care Act and The Data Protection Act 2018, the following questions may be considered:

- Is sharing the information necessary for the prevention or detection of crime, to protect public safety or to protect the rights and freedoms of others?
- Is sharing the information necessary to promote the safety of young people or adults?
- What risk to others is posed by this individual (alleged offender)?
- What will be the impact of sharing the information for the alleged offender?
- Will sharing the information be proportionate to the intended aim?
- Consider domestic abuse, coerciveness and influence – can the adult freely make the decision not to share?
- Is there an equally effective but less intrusive alternative means of achieving that aim?

Having due regard to the seriousness of the abuse and the potential risk to others, it is likely that sharing information in such circumstances would be justified. It is important that it is made clear to the adult at risk, and people involved with them,

such as relatives (if appropriate and the adult consents) that in these cases there is a necessity for the police and/or local authority to investigate due to the possible risk to other adults.

No part of the data protection regulatory framework serves to prevent the responsible dissemination of relevant personal information in relation to the investigation of suspected, alleged, or actual abuse of an adult at risk.

Confidentiality

Whether or not planning a response to an adult at risk concern is through informal consultations or a formal meeting, you are likely to be sharing information that would normally be considered confidential.

Each school holds information, which in the normal course of events, is regarded as confidential and will have their own safeguards and procedures for sharing this with other related agencies. Some information will be subject to the Data Protection Act 2018.

An adult at risk concern provides sufficient grounds to warrant sharing information on a “need to know” basis and/or “in the public interest” and unnecessary delays in sharing that information should be avoided. Whenever possible the adult must be consulted about information being shared on their behalf. Often consent has been given through the usual assessment process. There will be a need to share information with other agencies for example Health, Advocacy and the Police, and generally permission should be asked before doing so.

However in exceptional circumstances e.g. if it is considered someone is at serious risk of abuse then information may be disclosed without consent but the adult should be aware of the sharing of information and that it will be shared that they are not consenting if this is the case.

Where they have capacity and they are not being pressured or intimidated their agreement should be sought and their refusal respected.

If other adults are at risk the “public interest” principle may override their decision. The principles governing the sharing of information include:

- confidentiality must not be confused with secrecy
- information will only be shared on a ‘need to know basis’ when it is in the best interests of the service user(s)
- informed consent should be obtained but if it is not possible and other adults are at risk, it may be necessary to override the requirement

- it is inappropriate for agencies to give assurances of absolute confidentiality in cases where there are concerns about abuse, particularly in those situations when other adults may be at risk.

Record Keeping

The WRD will:

- keep clear, detailed, accurate, written records of concerns about adults at risk, (noting the date, event and action taken);
- ensure all records are kept securely, separate from the main school file, and in a locked location.

Record Transfer from Education to Adult Settings

An education setting may hold records dating back to when the young adult entered the education system. An individual decision must be made in relation to each learner as to what, if any, information needs to be transferred into the adult setting.

Staff should take into account all of the information in the previous section entitled “Consent and the Sharing of Information” when deciding what child protection records to transfer to the adult setting.

Staff should only transfer information about current and/or ongoing concerns rather than transferring whole files with historical information.

The young person’s/adult’s views about record transfer should be sought, having regard to their capacity to give informed consent. However, failure to consent should not deter the transfer of relevant, current safeguarding information.

Whistle blowers

Staff members and volunteers with serious concerns about any aspect of their work are encouraged to come forward and voice those concerns. Please see Appendix 5 for information on who you can contact if you have concerns.

Whistleblowers should know how to access support and to protect their own interests. Even if they decide that they wish to make an anonymous report, the information they provide will be taken into account and treated seriously. Further support can be found at Public Concern at Work - www.pcaaw.co.uk or call for confidential advice on 020 74046609.

Safer Working Practice

All staff and volunteers should be familiar with, and adhere to, the principles set out in "Guidance for safer working practice for those working with children and young people in education settings", 2015. This document should also be applied to work with adults at risk.

Appendix 1 Specific Indicators of Abuse

The following list of indicators is not exhaustive and the presence of one or more of them does not confirm that abuse has happened. However, a cluster of several indicators may require attention as they could indicate an adult/young adult is at risk of abuse.

The person may:

- deny that anything is wrong,
- show an acceptance of incidents as part of their situation,
- appear to be withdrawn or agitated and anxious,
- have restricted mobility due to absence of suitable mobility aids,
- seek attention or protection, often from numerous sources,
- look to others to answer questions even when directed to them,
- have dramatic changes in their behaviour or personality, without medical explanation,
- lack support from or carers to access health care/treatment, or access to professional support and services,
- be reluctant to return home,
- lack help from family/carers to allow them to go into respite/permanent care,
- not have access to professional and other visitors, or may find that they are not able to answer for themselves or confidentially.

The person may have:

- unexplained bruising or non-accidental injuries,
- abrasions, especially around the neck, wrists and/or ankles,
- unexplained burns, especially on the back of the hands,
- hair loss in one area, or their scalp may be sore to touch,
- frequent minor accidents without seeking medical help,
- unexplained fractures,
- be malnourished
- pressure sores and sores from lack of continence care,
- had their medication mismanaged and misused.

The person may:

- demonstrate over sexualised behaviour,
- complain of soreness in genital/anal area, without a medical cause known,
- have bruising on the inner thighs or shoulders, breasts and/or genital area,

- be pregnant or have a diagnosis of a sexually transmitted disease when it is not known that they are sexually active.

The person may:

- live in poor conditions, lack clothing, or lack of access to their own money,
- have an unexplained or sudden inability to pay bills,
- have been gifting and transferring their assets or property,
- have an unexplained or sudden withdrawal of money from their accounts,
- say their possessions of value go missing from home without satisfactory explanation,
- show a marked contrast with their previous lifestyle and standards,
- make unusual purchases unrelated to their known interests e.g. expensive make-up.

Appendix 2

What is 'Prevent'?

The Counter Terrorism and Security Act 2015 imposes a duty on 'specified authorities' to have due regard to the need to prevent people being drawn into terrorism. This includes not just violent extremism but also non-violent extremism which can create an atmosphere conducive to terrorism.

This is not about preventing learners from having political and religious views and concerns, but about supporting them to use these concerns or act on them in non-extremist ways.

The objective of Prevent is to prevent people being drawn into terrorism and ensure they are given appropriate advice and support.

As a Provider we must demonstrate that:

- staff, leaders and governors have undertaken appropriate training and development
- we exemplify **British Values** in our teaching and management through general behaviours as well as opportunities in the curriculum
- we encourage students to **respect** other people with particular regard to the protected characteristics set out in the Equality Act 2010.

ALL TUTORS AND OFFICE STAFF ARE REQUIRED TO COMPLETE AND REFRESH 'PREVENT AWARENESS TRAINING.'

AN ON-LINE COURSE IS LOCATED AT:

<https://www.elearning.prevent.homeoffice.gov.uk/restart>

Appendix 3 Whistleblowing

Public Concern at Work (PCaW)

For independent advice and support on public interest whistleblowing.

Tel: 020 7404 6609

Email: whistle@pcaw.co.uk

Whistleblowing Helpline

A helpline for staff and organisations working within the NHS and Social Care Sector **Tel:** 08000 724 725

Email: enquiries@wbhelpline.org.uk