

# Safeguarding and Promoting the Welfare of Children and Vulnerable Adults Policy & Prevent Duty

<b>Lead Responsibility</b>	Curriculum and Quality Manager (Consultant)	<b>Approved by</b>	Director
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<b>Policy applicable to</b>	All Stakeholders	<b>Date of next review</b>	February 2023

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## Policy Statement

TATC is committed to safeguarding and promoting the wellbeing of its learners. We fully recognise that it is the responsibility of all staff to ensure that all learners are safe and feel safe in the centre environment.

This policy is most significant for teaching staff who are particularly well placed to observe learners in relation to signs of abuse, harm, and changes in behaviour.

This policy brings together all of the relevant procedures for safeguarding and has particular reference to: safe recruitment; reporting safeguarding issues; establishing a safe environment; promoting safeguarding in the curriculum.

All employees are required to show high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm by fulfilling their duties for learners under 18 in accordance with:

- [‘Keeping Children Safe in Education - September 2021](#)
- [Working Together to Safeguard Children 2018](#)
- [Children & Social Work Act 2017 – safeguarding reforms](#)
- [“Safeguarding Children and Safer Recruitment in Education’ \(Dept. for Children, Schools and Families 2011\).](#)
- [Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children’ \(Dept. for Children, Schools and Families 2010\).](#)
- [Care Act 2014](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- [Prevent Duty Guidance for England issued under section 29 of the Counter terrorism and security Act 2015.](#)

## Ethos

TATC recognises the importance of learner feeling safe, and feel they are in an environment to disclose abuse. TATC will endeavour to support learners by:

1. Ensuring the content of the curriculum, particularly tutorials include relevant information and content.
2. Providing a positive secure environment where learners feel valued and supported.
3. Implementing a code of conduct to which learners sign up.
4. All complaints, allegations or suspicions of abuse will be dealt with due regard to our Safeguarding of Children and Vulnerable Adults Policy.
5. In order to be able to safeguard children and vulnerable, awareness of signs of possible abuse must be known.

## Definition of Abuse

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen syndrome by proxy.

Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and needs to be dealt with locally by personal tutors with the assistance of Student Services, with cases reported as per the College Anti Bullying & Harassment Policy.

**Psychological/Emotional abuse** is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on him or her emotional development. It may involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.

**Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, etc.

**Sexual abuse** includes rape and sexual assaults to which the vulnerable adult or child/vulnerable adult has not consented, or could not consent, or was pressurised into. Signs can include changes in behaviour, using sexual language or physical discomfort. It may also include encouraging children and vulnerable adults to behave in sexually inappropriate ways.

**Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her

health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

**Institutional Abuse:** this is poor professional practice in an institution designed to safeguard both children and adults, including neglect, and can take the form of isolated incidents right through to ill treatment or gross misconduct.

**Financial or Material Abuse:** this is when a child/vulnerable adult is exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

Safeguarding issues may also be recognised in the specific circumstances identified below:

- Child pornography and the Internet.
- Forced marriage of a child.
- Looked after children and children living away from home.
- Pregnancy of a child.
- Self-harming and suicidal behaviour.
- Radicalisation and extremism.
- Upskirting is now a form of abuse and a criminal offence (listed in paragraph 145 specifically on page 38 of Keeping Children Safe in Education). Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

## **Prevent Duty**

Prevent is 1 of the 4 elements of **CONTEST**, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

### **The Prevent Strategy:**

Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.

Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism

Enable TATC to carry out its duties under the Counterterrorism and Security Act 2015

The threat levels associated with a terrorist activity can be identified with the following 5 categories:

- a. Critical- an attack is expected imminently
- b. Severe – an attack is highly likely
- c. Substantial – an attack is a strong possibility
- d. Moderate – an attack is possible but not likely
- e. Low – an attack is unlikely

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

We use a range of measures to challenge extremism in the UK, including:

- where necessary, we will prevent apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context we work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities

### **Purpose for generating the Prevent Strategy**

TATC is a training provider for the 16+ age group including young apprentices who are diverse ethnically, socially and economically and live-in disadvantaged areas. Given the age group and apprentice profile, it has become a statutory requirement for us to come up with a Prevent strategy which focuses on the following 4 core areas:

### **Leadership and Values**

To provide an essence of shared responsibility and wellbeing for all apprentices, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting respect, equality and diversity, democratic society, learner voice and participation
- Understanding and resolving apprentice and staff issues

- Engaging with local communities
- Actively working with local schools, local authorities, police and other agencies

### **Teaching and Learning**

To make the apprentices resilient through development of a curriculum which promotes knowledge, skills and understanding that would undermine extremist ideology. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to address local needs,
- Encouraging active citizenship/participation and learner voice.

### **Apprentice Support**

To ensure that staff are confident to take a proactive approach to the promotion of British values. This will be achieved through:

- Understanding the needs of the local community, our apprentices and their families
- Developing a robust and effective apprentice support system.
- Executing anti-bullying strategies and challenging discriminatory behaviour
- Supporting apprentices at risk through our safeguarding procedures
- Continuous attention to reduce the attainment rates of the learners at risk

### **Managing Risks and Reacting to Incidents**

To monitor risks and be ready to deal appropriately with issues which arise we will:

- Understand the kind of threat arising from violent extremism to gauge its impact directly or indirectly on our organisation and its activities.
- Respond to local events, national or international news that may impact our students and communities
- Ensuring plans are in place to respond aptly to a threat or incident

### **Possible signs of radicalisation:**

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views

- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups
- The individual expresses a desire/intent to take part in or support extremist activity

### **Promoting British Values**

TATC recognise the important role it can play in helping to prevent people being drawn into terrorism and in providing appropriate advice and support.

TATC has a vital role in ensuring that groups or individuals within the centre are not subjected to intimidation or radicalisation by those wishing to unduly, or illegally, influence them.

It follows equal opportunity guidance which guarantees that there will be no discrimination against any individual or group, regardless of faith, ethnicity, gender, sexuality, political or financial status or any protected characteristic.

TATC uphold the acceptance of fundamental British values which it is its responsibility to promote. In doing so its learners will be able to grow as individuals and citizens in the community in which they live.

The British values are:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of those with different faiths and beliefs

TATC seek to create an environment that enables learners to become rounded members of society who treat others with respect and tolerance

### **E-Safety**

The internet is an important education tool, but also carries risks associated with unwanted contact and bullying, inappropriate content, commercial exploitation and radicalisation toward extremism and terrorism.

The safeguarding responsibilities extend to the online world so that we can maximise the opportunities of digital technology and help young people and vulnerable adults to use the internet safely and responsibly.

At TATC there is a focus on raising awareness and understanding of e-Safety issues amongst learners via the safeguarding and the Trainer/administrative team. This will include the availability of e-safety resources for learners.

The policy applies to all learners and particularly young people and adults who may need support and all staff, volunteers, partners and families living and working at college center, other external facilities, in the workplace or distance or online learning.

An e-Safety incident is considered to have occurred when a learner, staff member or Governor instigates, or is the victim of, an activity which utilizes Information and Communications Technologies (ICT) to endanger the personal safety, mental wellbeing, or financial wellbeing of another individual.

Activities which will be considered E-Safety incidents include, but are not limited to, the use of ICT to:

- Access, view, copy or download illegal content, or materials, including, but not limited to:
- child pornography
- materials inciting racial hatred or violence
- materials that are deemed to be in connection with radicalisation or will place learners at risk of radicalisation.
- Access, view, copy or download inappropriate content, or materials, as defined by the College's Acceptable Use of ICT policy.
- Bully or harass an individual or group (Cyber Bullying).
- Commit fraud or identify theft.
- Undertake any activities which would be in violation of the Child Protection, Protection of Vulnerable Adult or Anti-Bullying policies
- Any other incident where it can be reasonably considered that the personal safety, mental wellbeing or financial health of an individual has been endangered by the use of ICT.

In this context ICT includes, but is not limited to:

- a) College owned equipment, including:
  - Desktop PC's
  - Servers
  - Laptop/Tablet devices
  - Telephones, both fixed and mobile
  - Digital video camera or camcorders
  - Digital audio recording devices
  - Reproduction devices (scanners, printers, etc..)
  - Any and all software and IT services provided by the College
- b) Privately owned ICT equipment (including personal mobile phones), when:
  - Connected to any College owned network
  - Utilised to access College software and services
  - Made use of on campus, or in the pursuit of college business.

## **Responsibilities**

It is the responsibility of every staff member to give full and active support for the policy by ensuring:

- The policy is accessible, known, understood and implemented.
- All actual and suspected serious e-Safety incidents are reported to the safeguarding team.
- Parents/Guardians, providers, sponsors, employers and other stakeholders have a responsibility to report any e-Safety concerns they may have to the College.
- All learners both Further and Higher education have a responsibility to:
- Report any e-Safety concerns they may have to a member of staff, this could be a Progression Coach, Trainer or Learner Mentor.
- Not engage at any time in any form of behaviour which would result in the occurrence of an e-Safety incident

### **Actions to Implement and Develop Policy**

1. Reporting All e-Safety incidents should be reported to a designated safeguarding person who will log the incident in the safeguarding database, and where necessary will engage with external agencies.
2. Securing and Preserving Evidence IT Services should be contacted immediately following the reporting of any serious e-Safety incidents and asked to make copies of relevant access logs, files etc... If it is believed that an immediate risk of exposure to illegal or inappropriate materials, or mental distress exists to staff or learners, the computer or devices should be turned off immediately. ***You should not “shutdown” or log off as this may corrupt, delete or overwrite evidence, the power supply should be turned off at the wall or the battery should be physically removed. The equipment should then be moved to a secure location.***
3. Illegal Material or Activities Where an e-safety incident is reported to the college this matter will be dealt with very seriously. The college will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a learner wishes to report an incident, they can do so to their Trainer or to the Senior Safeguarding Officer. Where a member of staff wishes to report an incident, they must contact their line manager. Following any incident, the college will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place; external agencies may be involved, or the matter may be resolved internally. Depending on the seriousness of the incident. Serious incidents will be dealt with by Senior Management, in consultation with appropriate external agencies. The Head of IT Services is responsible for involving other senior managers and law enforcement agencies as required. IT Services will assume responsibility for obtaining, securing and preserving appropriate additional evidence. For example, remote screen shots, web filter logs etc. If it is believed that there is a child protection issue the procedures outlined in the Safeguarding policy should be implemented.

4. Indecent imagery. It is a criminal offence to take, show, and share indecent images of children and young people, those under the age of 18 can face prosecution for taking indecent images of themselves and sharing them with others. (Section 1 Protection of Children Act 1978).

***Under no circumstances should any person make copies, including screen shots or print outs, of suspected child/ young person indecent imagery. Taking copies of such materials, even when intended for evidentiary purposes, is a crime.***

5. Inappropriate Material or Activities Inappropriate material or activities are considered to be any materials or activities which are considered as unacceptable by the Acceptable Use of IT policy.
6. Staff Access to Inappropriate Material Where it is suspected that a staff member has been accessing inappropriate material, or attempting to access, the time and date of the incident should be noted, and the concerns raised with the head of Human resources.
7. Learner Access to Inappropriate Material Where it is suspected that a learner has been accessing inappropriate material, or attempting to access, the time and date of the incident should be noted and brought to the attention of the relevant Curriculum Leader or Head of School. The safeguarding team should be contacted who may then liaise with the IT Helpdesk to take copies of relevant access logs etc...
8. Cyber-Bullying can be defined as making use of IT to undertake to bully. Examples of cyber-bullying include, but are not limited to:
  - Sending offensive or abusive e-mails, instant messages, or “text” messages.
  - Inviting selected individuals to a chat room or website to discuss another individual who has not been invited.
  - Posting offensive, defamatory or abusive messages about an individual or group to a public or members only internet forum.

Using a digital camera to take humiliating images Incidents of actual or suspected cyber-bullying should be dealt with in accordance with the Anti-Bullying policy.

9. Virus & Malware Protection. The college will do all that it can to make sure the college’s network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of Firewalls, servers, routers, workstations etc. to prevent accidental or malicious Access of systems and information. Digital communications, including email and Internet postings, over the college network, will be monitored in line with the Network Usage Policy.

IT Services will make all reasonable efforts to ensure current, up to date, anti-virus and malware protection is installed on all College systems. However, users of the systems have a responsibility to:

- Alert IT Services if they discover a fault with their anti-virus and anti-malware software
- Ensure personally assigned devices (i.e. laptops) are connected to the network at least once per month.

### **Roles and Responsibilities**

TATC will ensure that all relevant procedures and recommendations set out by TATC Management will be followed to:

1. Ensure there is a designated senior member of staff for safeguarding who has received appropriate training and support for this role. This training will be updated at required intervals. The designated Safeguarding Officer is **Folu Oyegbesan**. The Safeguarding Officer will ensure there is a clearly identifiable, easily accessed, referral process.
2. Ensure there is a designated member of the TATC responsible for Safeguarding.
3. Ensure there is a Safeguarding and learner Coordinator, responsible to the Safeguarding Officer, with clearly defined responsibilities who will provide support to the Safeguarding Officer.
4. Ensure all members of staff know the names of the Safeguarding Officer and the Safeguarding and learner Coordinator.
5. Ensure all members of staff understand their responsibilities in referring any concerns to the Safeguarding and learner Coordinator.
6. Ensure all staff receive training to the required level which is updated as required. Records of safeguarding training to be kept centrally by the learner Coordinator.
7. Ensure all relevant Safeguarding procedures are kept up-to-date in line with legislation.

### **The Director will:**

1. On receipt of a completed Form alleging abuse of a child, or vulnerable adult by persons known or unknown, the Directors will inform the appointed safeguarding member of staff and ensure that they receive a copy of the completed Form within 24 hours.
2. On receipt of a completed Appendix 3 Form accusing a member of staff of abusing a child or vulnerable adult, the Directors will take action in accordance with the staff Disciplinary codes and procedures of the Centre.
3. Ensure that everyone with substantial access to children and vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.

4. Providing professional advice, support and guidance to staff regarding any suspicion of abuse, if a young person or vulnerable adult makes a disclosure or in relation to the possible abuse of trust.
5. Provide professional advice, support and guidance to staff regarding causes for concern other than abuse with regards to children and vulnerable adults.
6. Gathering statements and information regarding child and vulnerable adult safeguarding issues and ensure that records are kept safely and securely.
7. Making decisions, in consultation with the Directors, regarding appropriate action.
8. Sharing information and making referrals with Children's Social Care or the Safeguarding Vulnerable Adult Coordinator at Social Services, where appropriate, to support child protection enquiries and children in need assessments as well as safeguarding vulnerable adult learner enquiries.
9. Monitoring learners after a referral is made and ensuring that the Centre is adhering to any work agreed with Social Services or other agencies.
10. Producing an annual report, that reviews how the duties have been discharged.
11. Liaising with the Local Safeguarding Children Boards.
12. Ensuring that everyone with substantial access to children and vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation.
13. Undertaking annual training on Safeguarding.
14. Develop effective links with relevant agencies and cooperate as required with requests.
15. Attend Safeguarding meetings and Case Conferences.
16. Keep written records of reported Safeguarding issues.
17. Ensure all records are kept securely.

## **Safeguarding Procedures**

### **1) Handling a concern**

- If staff/employer are concerned about the well-being of a learner/apprentice and are concerned that there may be a safeguarding issue, they should inform one of the designated Safeguarding Officer immediately.
- Staff/employer must discuss concerns directly with a designated safeguarding officer who will email via their dedicated email address or contact a safeguarding officer giving all relevant details. This is needed for records keeping purposes. A referral can only be made to the designated Safeguarding Officer.
- Safeguarding referrals are seen within 24 hours, or 48 hours if a referral is made on a Saturday.
- It is not the staff's or employer's responsibility to investigate anything themselves. It is their responsibility to make the referral immediately to the Safeguarding Officer.
- Managing a disclosure staff/employers must:

- Listen carefully
  - Record the conversation in the person's words (handwritten notes)
  - Take note of the time, sign, and date the record
  - Take all allegations or disclosures seriously (never judge). Reassure the individual that they are right to disclose
  - Explain what will happen next. (a safeguarding referral is being made)
  - Safeguarding Officer will attach/upload the notes taken and log them onto the Safeguarding tracker.
- In managing a disclosure staff/employer must not:
    - Ignore any safeguarding allegation or disclosure Ask leading or prompting questions
    - Make promises they are not able to keep in confidence Jump to any immediate conclusions
    - Speculate or accuse anyone
    - Discuss concerns with a parent, carer, guardian or family member in the first instance.
    - Keep any allegations confidential (every safeguarding concern must be passed over to the safeguarding team)
  - Following the disclosure and the referral, staff/employer may be involved in a number of ways:
    - They may have further concerns about the learner and refer additional concerns to the safeguarding team.
    - Asked to provide additional information or be involved in an assessment or multi agency meeting; they may be asked to provide specific support as part of an agreed action plan.

## **Recruitment**

Safeguarding Children and Safer Recruitment in Education came into force on 1 January 2007. All staff employed in the Personnel department undertake training. To ensure current best practice is implemented this training is regularly updated. TATC has adopted all of the recommendations for safer recruitment, selection, induction and ongoing professional updating and development.

## **Safe Working Practices**

TATC has developed procedures for Codes of Practice for staff to understand and agree in relation to professional conduct with students.

All staff have access, to "Safe Working Practice for Adults who work with Children and Young People", a copy is included in the staff handbook.

Health and Safety and risk assessments are carried out in lessons and indicated on lesson plans, along with all aspects of Every Child Matters.

TATC has fully operational Health and Safety Policy and Procedures.

### **Record Keeping**

All safeguarding records are kept centrally and securely by the Safeguarding and learner Coordinator. Staff are aware that they must report all safeguarding issues to the Safeguarding and learner Coordinator.

### **Allegations against Members of Staff**

TATC recognises that when allegations are made regarding behaviour by staff which may harm a learner, clear procedure must be followed.

### **Working with other Agencies**

TATC recognises the importance of multi-agency working. Whilst TATC is not, legally, an investigating agency it is essential that safeguarding issues are adhered through agreed procedures.

### **Other Legislation**

Some of the other legislation that safeguards children, young people and adults in the UK:

- [Adoption and Children Act 2002](#)
- [Adoption and Children Act 2006](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Data Protection Act](#)
- [Education Act 2002](#)
- [Freedom of Information Act](#)
- [Human Rights Act](#)
- [Protection of Children Act](#)
- [Sexual Offences Act 2003](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)

### **Monitoring and Review**

The policy will be monitored through monthly monitoring reports, the self-assessment process and reviewed every year. If any major changes are made before the next review date, this policy will be updated accordingly.

**Appendix form A**  
**Safeguarding vulnerable adults**  
**Initial cause for concern form**

Date .....

Time .....

Name of individual cause for concern is about .....

D.O.B/ age (if known) .....

Address (if known) .....

.....

.....

Describe your concern and action taken

Observations to support cause for concern

Description and location of any visible marks, bruising etc

Name of alleged abuser and relationship with vulnerable adult (if known)

Signature of person completing the form: .....

Witness: .....

Date:

## **Review of Policy**

This policy was last reviewed in February 2022. The next review date is February 2023, and this will be completed by the Curriculum and Quality Manager (Consultant). The policy will then be approved and signed off by the Director.

## **Policy Approval**

**Director's Name: Foluso Olubukola Oyegbesan**

**Director's Signature**

**Date:** \_\_\_\_\_