

Policies - Work and Skills – London Borough of Barking and Dagenham

Safeguarding (including Prevent) Policy 2021 – 2022

Policy Number	Service Wide Policy 21
Lead Responsibility	Service Manager – Business Support
Designated Officer	Student Services Manager
Advisory Officer(s)	Admin and Facilities Manager
Approved by	Service Manager – Business Support
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Date of next review	August 2022
Policy applicable to	All staff, service users, visitors, partners & contractors

1. Introduction

- 1.1 Work and Skills recognises its statutory duty and responsibilities to safeguard and promote the safety and welfare of children, young people and those adults deemed as vulnerable.
- 1.2 This policy is deemed to apply to all staff who are employed by the Service on a full time, part time or sessional basis, support workers and volunteers.
- 1.3 The purpose of this policy is to ensure that the rights of all service users, are protected through staff awareness and that the Service is an environment where service users and staff are and feel safe. Furthermore, staff are aware of their roles, responsibilities and follow the service, statutory and local guidelines in the reporting of concerns.
- 1.4 Our duties and responsibilities are outlined in a range of legislation including:
 - The Children Act (2004),
 - The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people,
 - Safeguarding Vulnerable Groups Act 2006, amended in the Protection of Freedoms Act 2012,
 - Equality Act 2010, introduced a Disclosure Barring Service (DBS) checks for staff and others who have defined levels of contact with children, young people and 'at risk' adults,
 - The Mental Capacity (MCA) 2005,
 - The Counterterrorism and Security Bill with relevance to the Prevent Duty, The Female Mutilation (FGM) Act 2003 as amended by the Serious Crime Act 2015, plus other relevant legislation.
 - And in statutory guidance Keeping Children Safe in Education September 2021, to safeguard and promote the welfare of children and young people and to work with other agencies to ensure adequate arrangements with Work and Skills to identify, assess and support children and young people who are suffering harm.
- 1.5 Safeguarding adults is about preventing and responding to concerns of abuse, harm, or neglect. The Service is committed to raising staff awareness of all aspects of safeguarding, preventing abuse where possible and ensuring that robust procedures are in place for dealing with incidents of abuse and recruitment.
- 1.6 The Service recognises that all service users could be victims of abuse, and all staff have a duty to identify any service user who may be experiencing, or at risk of experiencing, abuse, or harm on our premises, at home, through online computer networks or in relationships, and take appropriate action to ensure their safety.
- 1.7 This policy covers all adult learners and the children participating in Family Learning programmes. Under 16's cannot be accepted in classes, except for family learning courses. Staff and service users should not bring their children into Centre's while they are working or studying. The exception to this is during the enrolment process when learners may have their children with them.
- 1.8 We believe that every service user deserves to be happy and secure in their activities and have the right to be protected from harm. Service users need to be safe and feel safe whilst participating in all aspects of the service and receive support which matches their individual needs. Service users, staff and visitors should respect the background, values, and beliefs of others.

The Service can and should contribute to keeping service users safe from abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views, being drawn into extremism and risk-taking behaviours

Carers/parents need to feel sure that the people in charge of these activities are trustworthy, responsible and will do everything they can to keep service users safe from harm, as well as act upon any concern relating to the learners' safety and wellbeing.

We will empower service users to resilient to extremism and protect the wellbeing of service users who maybe vulnerable, promoting and reinforcing shared British values.

1.9 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activities in support of terrorism. The normalisation of extreme views may also make service users vulnerable to future manipulation and exploitation. The Service is clear that exploitation and radicalisation should be viewed as a safeguarding concern.

The Service will:

- Review this procedure annually to take account of any new government legislation, regulations, or best practice documents
- Ensure that staff are trained in safeguarding and prevent and are kept fully up to date with their responsibilities and duties with regards to the safety and well-being of vulnerable adults, children, and young people

1.10 The following six principles underpin all safeguarding work in the service:

- Empowerment – service users being supported and encouraged to make their own decisions and informed consent. If consent isn't given, but to fulfil its statutory safeguarding duties, the service still must make a referral to Children's/Adult Social Care and/or Police. This will be explained sensitively and supportively along with an explanation as to the reasons why.
- Prevention – it is better to act before harm occurs.
- Proportionality – the least intrusive response to those in greatest need.
- Partnership – local solutions through services working with communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- Accountability – accountability and transparency in delivering safeguarding

2 Intent

The intent of the Safeguarding Policy is to:

- 2.1 Ensure all staff, volunteers, contractors, and partners are aware of their responsibilities regarding safeguarding service users.
- 2.2 Ensure staff, volunteers, contractors, and partners know the procedures that should be followed if they have a safeguarding cause for concern.
- 2.3 Ensure staff, volunteers, contractors, and partners know how to access additional information regarding safeguarding.
- 2.4 Provide an environment in which all service users are kept safe, feel safe, secure, respected, and valued.
- 2.5 Identify service users who are at risk of and/or likely to suffer significant harm, and appropriate action is taken. This includes the risk of radicalisation as noted in the Prevent Duty.
- 2.6 Provide information and support in accessible ways to help adults understand the different types of abuse, how to stay safe and how to raise a concern about the safety or well-being (for themselves or another person).
- 2.7 Empower and enable service users to feel confident and know how to access help if they are in difficulties.
- 2.8 Develop a robust procedure within Work and Skills, which will be followed by all staff in cases of suspected abuse, radicalisation, and extremism.
- 2.9 Ensure safe recruitment practices are in place and that we are checking the suitability of staff and volunteers who work with or proximity to children or vulnerable service users are outlined and adhered to.

We have robust procedures and practices to support the service's commitment to safeguarding, child and adult protection.

3 Confidentiality and sharing information

- 3.1 We recognise that all matters relating to safeguarding and child and learner's protection are confidential.
- 3.2 Once a disclosure and referral have been made, the incident should be considered confidential – and the information should only be shared with Safeguarding Team. The Designated Safeguarding Lead or Deputy will share information with other professional/agencies who are able to take protective action.
- 3.3 All information regarding safeguarding issues will be kept in secure electronic files.
- 3.4 The Service is obligated to work and share information with external agencies charged with the protection of children, young people, and vulnerable adults. This includes social services, the police, LBBB Local Authority Designated Officer (LADO) etc based on the need-to-know basis only.
- 3.5 The Service works closely with the Borough Prevent Team and through them refer to the Channel process when necessary.
- 3.6 Please note: 'confidentiality' is often misunderstood. An over emphasis on confidentiality can leave young people or vulnerable adults in danger of harm. If something is confidential, that does not mean that it cannot be shared.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of vulnerable service users.

3.7 However, it is important to:

- All staff must be aware that they cannot promise a child, young person, or learner to keep secrets which might compromise safety or well-being or that of another
- Inform the individual making the disclosure that information they provide will be shared, why and with whom
- Record what you share, and with whom

4 Expectations

4.1 All staff and volunteers will:

- Be subject to safer recruitment processes and checks, whether they are new staff, agency, or volunteers
- Have attended a safeguarding induction
- Be familiar with this safeguarding policy & procedures
- Have read and acknowledged part 1 of Keeping Children Safe in Education (2021)
- Have read and acknowledge part 3 of Keeping Children Safe in Education (2021), if they lead on recruitment
- Provide a safe environment in which service users can learn and access information and support
- Be alert to signs and indicators of possible abuse
- Deal with a disclosure of abuse from service users or staff by informing one of the safeguarding team immediately
- Record concerns and submit to adultcollegesafeguarding@lbbd.gov.uk
- Always adhere to Employee Code of Conduct guidance – see Safeguarding and Prevent Procedures

5 Supporting Staff

- 5.1 We recognise that staff working within Work & Skills who have become involved with a service user who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 5.2 We will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support. This could be provided for all staff by, for example, Occupational Health and/or a tutor/trade union representative as appropriate.
- 5.3 We understand that staff should have access to advice on the boundaries of appropriate behaviour. The document guidance for safer working practice for those working with children and young people in educational settings, [Guidance for Safer Working Practice for those working with children and young people Addendum April 2020 \(theredway.net\)](#), provides advice on this and the circumstances which should be avoided in order to limit complaints against staff of abuse of trust and/or allegations of physical or sexual abuse.

6. Online safety

- 6.1 A wide range of technologies are now used in education. Safeguarding service users against risk involved in using such technologies, often referred to as online safety, is an important part of an overall safeguarding strategy.
- 6.2 At a simple level E-Safety means being safe on the internet and whilst using technology.
- 6.3 The Service recognises that safeguarding service users and providing them with the skills to safeguard themselves when using technology, is a key aspect of the College educational offer.
- 6.4 The Service recognises that banning, blocking, and filtering approaches, though useful, cannot be regarded as sufficient protection for service users and it does not relieve the Service of a duty of care regarding safeguarding learners and employees.
- 6.5 Through a combination of effective policies and practice, a robust and secure technological infrastructure and education and training for service users and staff, the Service will develop an effective online safety strategy across all learning provision.
- 6.6 The strategy will:
 - Provide a safe environment for all learners and employees
 - Adhere to legal responsibilities
 - Ensure that technologies are used responsibly to support innovative and effective learning and teaching
 - Educate learners to identify the risks technology can present, and help them develop the skills they need to safeguard themselves
 - Assess the risks presented by technology and develop appropriate policies and guidance to mitigate against those risks
 - Promote a culture of online safety within the service
- 6.7 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - **contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

7. Prevent

From July 2015, in line with the Prevent Duty Guidance for Further Education Institutions in England and Wales, protecting learners from the risk of radicalisation formed part of the service' wider safeguarding duties.

The Prevent duty: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

7.1 We recognise that Work & Skills plays a significant part in the prevention of harm to service users by providing them with effective lines of communication with trusted adults and a culture of safety and protection.

7.2 The Service will therefore:

- Establish and maintain a culture which is understood by all staff, which enables service users to feel secure and encourages them to talk knowing that they will be listened to.
- Ensure that all service users know there is an adult in the Service whom they can approach if they are worried or in difficulty.
- Provide curriculum & employment opportunities which equip service users with the skills they need to stay safe from harm and to know to whom they should turn for help.
- Ensure there are opportunities in the curriculum to promote British values to learners. British values are defined as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs.” (Prevent duty guidance HM government Dec 2014).

8. Impromptu and emergency situations

Staff may not take their own children into classrooms or offices when they are working onsite.

9. Safer recruitment

9.1 It is vital that we maintain a culture that safeguards and promotes the welfare of service users.

9.2 As part of this culture, we have adopted robust recruitment procedures that deter and prevent people who are unsuitable to work with vulnerable service users from applying for or securing employment, or volunteering opportunities within the college.

9.3 The Service acts reasonably in making decisions about the suitability of prospective employees based on checks and evidence including, DBS, barred list, and prohibition, Right to Work checks, together with references and interview information.

9.4 Recruiting managers complete Recruitment and Selection and Equal Opportunities training every three years.

9.5 The Administration and Facilities team (AFM's & BSO's) undertake Safeguarding and ETF Safer Recruitment training every year and continue to follow the relevant safer recruitment processes including as appropriate, the relevant sections in part 3 of Keeping Children Safe in Education (2021) (KCSE).

9.6 For staff in regulated activity DBS checks are undertaken.

The posts that are currently subject to an enhanced DBS check are:

- Access Facilitator
- Curriculum Managers
- Learning Assistants
- Tutors
- Student Services Manager

London Borough of Barking and Dagenham require all DBS checks to be renewed triennially.

9.7 The Service will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found in part four: Allegations made against/concerns raised in relation to teachers, including supply, other staff, volunteers, and contractors.

9.8 The Adult College will continue to consider and make referrals to the Teaching Regulation Agency (TRA) (as in section 333/334 of KCSE 2021) and the TRA's 'Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

9.9 Where Work and Skills are utilising volunteers, we will continue to follow the guidance as noted throughout KCSE 2021.

Under no circumstances should a volunteer be left unsupervised.

10 Induction, Training and Awareness Raising

10.1 The Service commits itself to a programme of training and awareness raising for all staff, and to commitment of the necessary resources for this purpose.

10.2 All staff complete Safeguarding & Prevent training modules and a safeguarding induction as part of their formal induction.

10.3 Staff complete formal training on annually. College staff complete bespoke training the Adult College Safeguarding module. Employment and Skills and Vocational support teams complete iLearn Safeguarding Adults training on an annual basis.

Staff receive safeguarding updates via monthly newsletters, email, e-bulletins, & staff meetings as required. Safeguarding updates and notices are also displayed throughout the sites.

The Safeguarding team receive training related to their role every two years.

The Designated Safeguarding Lead and Deputy Lead undergo specialist training at least every two years.

Governors undertake a rolling programme of training which includes safeguarding

10.4 A copy of Keeping Children Safe in Education (KCSE) 2021 – Statutory guidance for schools and colleges is also displayed at college sites. KCSE sets out the legal duties staff in education must follow to safeguard and promote the welfare of children and young people. These guidelines apply to all our service users.

11. The Prevent Duty

11.1 All staff working in the Service (including volunteers) are required to be able to identify and report instances where they believe a service user may be at risk of harm or neglect including any harm through extremism or radicalisation to the safeguarding team.

11.2 The Government placed a duty on educational establishments including Further and Higher Education to prevent people from being drawn into or supporting terrorism and ensure that they are given appropriate advice and support. The Service continues to

raise awareness with staff and learners by providing training and information and promoting British values.

11.3 The Service values freedom of speech and the expression of beliefs as fundamental rights underpinning our society's values. Whilst we value free speech, we also believe it is subject to the laws and policies governing equality, human rights, community safety and community cohesion.

11.4 The Service seeks to protect service users from the messages of extremism including, but not restricted to, those linked to far-right extremism, religious extremism, and animal rights extremism. We are committed to supporting those who are vulnerable to extremism and their friends and families where appropriate.

12. What happens if the Safeguarding Policy is not adhered to?

We will not tolerate behaviour which breaches the safeguarding Policy and will initiate disciplinary or other action, if circumstances warrant, against those who contravene the guidance contained within the policy and procedures.

13. Monitoring and Review

13.1 The DSL will monitor and review this policy annually and as required subject to updates within the sector.

13.2 The DSL will prepare termly reports for the Advisory Board, which review how the duties have been discharged.

Definitions

- **Vulnerable adult learner:**
- A vulnerable adult learner is an 'at risk' adult and defined as a person 'who is or may need community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000)
- **Radicalisation:**
- The process by which a person comes to support terrorism and forms of extremism leading to radicalisation
- **Extremism:**
- Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; calls for the death of members of our armed forces, whether in this country or overseas.

Addendum to Safeguarding Policy – Annex – March & September 2020

Response to Covid-19

There have been significant changes within the Service in response to the outbreak. Many service users and staff are now working from home.

This guidance has been developed as a response to COVID-19 DFE guidance and the DFE Keeping Children (and learners) Safe in Education regulations and guidance for Schools and Colleges updated in September 2020 and LBD Council guidance.

Despite the current changes, the Safeguarding Policy is fundamentally the same, staff should respond robustly to safeguarding concerns and contact the Safeguarding Team in line with our established safeguarding procedure.

This annex sets out some of the adjustments we are making in line with the changed arrangements in the Service and following advice from government and local agencies.

Staff will continue to follow the Safeguarding procedure and inform the Safeguarding Team immediately about concerns they have about any service user, whether in the classroom or learning online. COVID-19 means a need for increased vigilance.

Reporting arrangements

The Service arrangements continue in line with our safeguarding procedures in person at reception, via telephone 0208 270 4722, or email adultCollegeSafeguarding@lbbd.gov.uk

The Designated Safeguarding Lead is

Yvonne Bennett, Yvonne.bennett@lbbd.gov.uk, 0781291606

The Deputy DSL is

Harjit Mirgind, harjit.mirgind@lbbd.gov.uk, 0208 227 5477

Safeguarding Officers are:

Carol Chaplin	020 8227 3157
Natasha Chew	020 8227 5258
Saeda Almalkawi	020 8227 5272
Nick Heath	020 8227 3761
Cintia Jankoczi	020 8227 5826

The Safeguarding Team can be contacted whilst the college is open and via the DSL mobile in emergencies.

Awareness of increased risk

Staff should be aware of increased risk. The pressures on many adults and their families around poverty, and financial or health anxiety now are significant and reported cases of both domestic abuse, child abuse and mental ill-health have risen. Vigilance of staff in recognising this as learners continue to learn online and return to learning in the new academic year is essential. Staff are reminded to maintain the view that 'it could happen here' and to immediately report any concerns, no matter how small, to the Safeguarding Team.

Mental Health

The COVID-19 outbreak may have caused significant mental ill-health or wellbeing difficulties for some service user. It is important to recognise that while 'getting back to normal' is important and will be reassuring for many, staff will need to consider how to support:

- individual learners who have found the long period at home hard to manage
- those who have developed anxieties related to the virus
- those about whom there are safeguarding concerns
- those who may make safeguarding disclosures once they are back in

- the class.

The NHS Every Mind Matters platform has specific advice for adults on maintaining good mental wellbeing during COVID-19 outbreak. [Get Your Mind Plan - Every Mind Matters - NHS \(www.nhs.uk\)](https://www.nhs.uk/every-mind-matters)

Risk online

Learners are using the internet more during this period. Either as part of blended learning, live streaming of classes or attending fully online courses. We are also using online approaches to deliver IAG and/or support and enrol learners. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same safeguarding practices as when learners are learning in the classroom.

- The Service has selected the accessible and secure Microsoft Teams as its online platform to ensure appropriate filters and monitors are in place.
- Learners will be contacted via their Bardaglea email addresses where possible.
- Tutors will include online safety guidance as part of the learner induction and continue to embed this throughout the course.
- The Service continues to have eSafe monitoring in place which will monitor service users whilst using College systems.
- Learners have been issued with advice and guidance on staying safe during the period of remote learning.

Positions of trust and authority

Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by others and report any such incident to a senior manager. This is as relevant in the online world as it is in the classroom; staff engaging with learners online have a responsibility to always model safe practice.

Staff should ensure they are dressed decently, safely, and appropriately for the tasks they undertake; this also applies to online teaching.

Course ground rules for learners should be extended for online learning to include:

- Wearing suitable clothing.
- Using laptops/computers in appropriate areas with any personal information in the background removed.
- Reminders on being careful not to verbally share personal information online.