

Safeguarding Policy

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1. Scope and purpose of the Safeguarding Policy

Everyone who comes into contact with young people, vulnerable adults and their families has a role to play in safeguarding young people and vulnerable adults. Members of staff are particularly important as they are in a position to identify concerns early, to provide support and to prevent concerns from escalating.

This policy encompasses all aspects of safeguarding including e-safety, bullying and harassment (in person or electronically) and due regard to the prevention of young people becoming extremist or being radicalised. This policy should be read in conjunction with the relevant statutory guidance 'Keeping Children Safe in Education' (May 2016).

NGTC recognises that it forms part of a wider safeguarding system. This system is described in the statutory guidance 'Working Together to Safeguard Children' (2015).

NGTC will work with social care, the police, health services and other services to promote the welfare of young people and vulnerable adults and protect them from harm.

NGTC is committed to ensuring that it:

- Provides a safe environment for young people and vulnerable adults
- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that young people and vulnerable adults are kept safe, both at home and at NGTC.
- Promotes an environment in which every student feels valued and able to communicate their wishes and feelings successfully
- Ensures that there is a designated safeguarding lead
- All staff receive safeguarding training which is regularly updated

2. Safeguarding Commitment

All of our students, including young people and vulnerable adults, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse. **For the purposes of this advice a child is deemed to be any young person under the age of eighteen.**

Vulnerable Adult Definition

NGTC is guided by the Department of Health's definition of a vulnerable adult; 'those in need of 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 against significant harm or exploitation.'

(No Secrets, Department of Health, March 2000)

'Safeguarding is everyone's responsibility'

All members of NGTC community, including staff paid and unpaid, NGTC Management, students, contracted and franchised staff, are responsible for safeguarding and promoting the welfare of young people and vulnerable adults and will be made aware of NGTC Safeguarding Policy and procedures.

Responsibility for protection of our learners, including young people and vulnerable adults must be shared because people are safeguarded only when all relevant agencies and individuals accept responsibility and co-operate with one another.

The learning environment will be one in which our learners feel valued and respected, and are encouraged and supported through the curriculum, support, work experience and training areas to raise any concerns they have about their own safety and welfare.

Disclosures about abuse or neglect and allegations against persons in a position of trust made by young people or vulnerable adults must always be taken seriously and reported in line with NGTC procedures, and with due regard to the privacy of the child, young person or vulnerable adult and their family.

Safeguarding Children Procedures provide a clear framework for raising concerns or worries about a child or young person and should be read and understood by all NGTC community.

3. Types of Abuse and Neglect

Children who may require early help

Staff and volunteers working within NGTC should be alert to the potential need for early help for children. Staff and volunteers should consider following the procedures identified for initiating early help for a child or young person who:

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a young carer;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence;
- Has returned home to their family from care; and/or
- Is showing early signs of abuse and/or neglect.

Child Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children. There are four types of child abuse as defined in 'Keeping Children Safe in education' (July 2015) as follows:

Physical abuse: May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may include a failure to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment),
- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate caregivers);
- Ensure access to appropriate medical care or treatment;
- Neglect of, or unresponsiveness to, a child's basic emotional needs

Other reportable forms of abuse include;

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection or status. The manipulation or 'grooming' process involves befriending children, gaining their trust and often feeding them drugs and alcohol, sometimes over a long period of time before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Key indicators of children being sexually exploited may include;

- Going missing for periods of time or regularly coming home late;
- Regularly missing employment or education or not taking part in education;
- Displaying inappropriate sexualised behaviour
- Receiving unexplained gift or gifts from unknown sources
- Associating with other young people involved in exploitation;
- Having multiple phones
- Mood swings or changes in emotional wellbeing
- Seen at strange meeting places (hotels or known places of concern)
- Having older boyfriends / girlfriends
- Self-harming / drug or alcohol misuse
- Injuries (physical)

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

- *Inappropriate relationships* - Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- *Boyfriend* - Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- *Organised exploitation and trafficking* - Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs or non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

The Serious Crime Act 2015 sets out a duty on professionals to notify police when they discover that FGM appears to have been carried out on a girl under 18.

Domestic Abuse

The Government defines domestic abuse as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

Psychological
Physical
Sexual
Financial
Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of their means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.*

*This definition includes so called 'honour' based violence, female genital mutilation and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Domestic Abuse does not necessarily involve physical violence and may include the following:

- The learner feels scared of angering their partner
- The learner is constantly being checked up on
- The learner is being isolated and may be kept away from friends or family
- The learner is being manipulated, which could involve the withholding of affection as well as being lied to and shouted at
- Threats are being used for control
- Money or food are being withheld from the learner
- The learner is being repeatedly criticised, being told they are worthless, and humiliated in front of others?

If domestic abuse is suspected or reported then the staff should follow the guidelines outlined in appendices 2 and 3. NGTC will offer support through its internal welfare and counselling service and through its partnerships with local agencies.

Forced Marriage

Forced Marriage is a marriage conducted without the consent of both parties and where duress is a factor. It is an entirely separate issue from an arranged marriage which is freely entered into and the two should not be confused.

Acts such as Forced Marriage and other so called 'honour crimes' come under the definition of Domestic Violence, and a child who is subjected to this is at risk of significant harm through physical, sexual and emotional abuse.

Young people forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal

development. They may feel unable to go against the wishes of their parents and consequently may suffer emotionally, often leading to depression and self-harm.

Students who fear they may be forced to marry often come to the attention of, or turn to, an education professional before seeking help from the police or social services. Often the student's friends report it to the education professional. Education professionals are in an ideal position to identify and respond to a victim's needs at an early stage.

If the student fears they may be forced to marry, they have limited choices:

- To remain with the family and try to resolve the situation
- To accede to the family's wishes
- To flee the family
- To seek legal protection.

Remember:

- Remaining with the family and trying to resolve the situation can place the student in danger.
- Acceding to the family's wishes means the student is returning to an abusive situation.
- Students fleeing a forced marriage that has not yet taken place may be reported as missing by their families. The forced marriage aspect of the case may not be apparent when the report is made.
- If the student has dual nationality, they may have two passports, one British and one from the other country of their residence.

What to do if a student seeks help or if you have suspicions that a student may be forced to marry

You must:

- Be alert to disappearance from education.
- ***If you have concerns for the safety of a student under 18 years old*** liaise with NGTC Safeguarding Officer immediately for advice. They will take the responsibility for following Local Safeguarding Children Board (LSCB) and NGTC Safeguarding procedures
- If you cannot locate a Safeguarding Officer contact Children's Social Care and Police immediately for advice.
- ***If you have concerns for the safety of a student over 18 years old*** explain all the options to the student, recognise and respect their wishes. If the student does not want any referral to be made, e.g. to the Police, staff will need to consider whether the student's wishes should be respected or whether the student's safety requires that further action be taken. If you do take action against the student's wishes, you must inform them.
- If the student is a vulnerable adult, referrals should be made in accordance with the local Multi-agency Adult Protection Committee procedures and protocols to protect vulnerable adults from abuse. This will be done by a Safeguarding Officer. Staff must notify NGTC Safeguarding Officer of their concerns. If a Safeguarding Officer cannot be contacted you must contact the Police, Social Services or the Forced Marriage Unit, but you must also notify a Safeguarding Officer of this referral. Due to the nature of forced marriage and honour-based violence, you need to be aware that it's not always safe or the best place for someone to be with their family and the practice of

attempting to resolve cases through family counselling, mediation, arbitration and reconciliation.

- See the student immediately in a private place, where the conversation cannot be overheard.
- See the student on their own – even if they attend with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Establish if there is a family history of forced marriage, i.e. siblings forced to marry. Other indicators may include domestic violence, self-harm, family disputes, unreasonable restrictions (e.g. withdrawal from education, being confined to home) or missing persons within the family.
- Refer to NGTC Safeguarding Officer, who will contact the local police Child Protection Unit if there is any suspicion that a crime has been, or may be, committed. They will also liaise with the police if there are concerns about the safety of the student or the student's siblings.
- Safeguarding Officers will notify Wigan Council Domestic Abuse of any incidents of concerns for monitoring purposes.

Do Not:

- Treat such allegations merely as a domestic issue and send the student back to the family home.
- Ignore what the student has told you or dismiss out of hand the need for immediate protection.
- Approach the student's family or those with influence within the community, to attempt mediation, as this will alert them to your concerns and may place the student in danger.
- Contact the family in advance of any enquiries by the police, children's social care or the Forced Marriage Unit, either by telephone or letter.
- Share information outside NGTC Information Sharing protocols without the express consent of the student.
- Breach confidentiality except where necessary in order to ensure the student's safety.

What to do if a student is going overseas imminently.

- Try to gather as much of the following information as possible, as there may not be another opportunity if the student goes overseas. This information may help the Forced Marriage Unit to locate the student and assist to repatriate them.
- A photocopy of the student's passport for retention. Encourage them to keep details of their passport number and the place and date of issue.
- As much information as possible about the family (this will need to be gathered discreetly) including:
 - **Full name and date of birth of the student under threat**
 - **Their father's name**
 - **Any addresses where the student may be staying overseas**
 - **Potential spouse's name**
 - **Date of the proposed wedding**
 - **The name of the potential spouse's father (if known)**

• **Addresses of the extended family in the UK and overseas.**

- Information that only the student would be aware of (this may assist any subsequent interview at an Embassy/British High Commission in case another person of the same sex/age is produced pretending to be the student).
- Details of any travel plans and people likely to accompany the student.
- Names and addresses of any close relatives remaining in the UK.
- A safe means by which contact may be made with the student e.g. a secret mobile telephone that will function overseas. Record the number.
- An estimated return date. Ask that the student contact you **without fail** on their return.
- A written statement by the student explaining that they want the police/children's social care/third party to act on their behalf if they do not return/make contact by a certain date.

Remember:

- Give the student the contact details of the nearest British High Commission/Embassy.

Further Information

- Advice can be sought from specialist caseworkers at the Forced Marriage Unit on 020 7008 0151 or website www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/
- NGTC has a duty to notify the relevant local authority and partners of all incidents.

Preventing Radicalisation

The Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside college
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others.

Prevent Identification of Concern - In the event of noticing changes about a student that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to the Prevent Lead, Karen Green. The Safeguarding team will take action on a case-by-case according to the information given to them. The team will make any assessments or external referrals as required.

Self-Harming

Self-Harming is becoming much more prevalent in society and our staff must be trained to spot tell-tale signs. Because self-injury is often kept secret, it may be difficult to spot signs and symptoms. Signs may include:

- Scars, such as from burns or cuts
- Fresh cuts, scratches or other wounds
- Bruises
- Broken bones
- Keeping sharp objects on hand
- Spending a great deal of time alone
- Wearing long sleeves or long pants even in hot weather

Modern Slavery and Human Trafficking

Modern Slavery encompasses slavery, human trafficking, forced and compulsory labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

A large number of active organised crime groups are involved in modern slavery. But it is also committed by individual opportunistic perpetrators.

There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist.

Someone is in slavery if they are:

- Forced to work - through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races.

Human trafficking involves an act of recruiting, transporting, transferring, harbouring or receiving a person through a use of force, coercion or other means, for the purpose of exploiting them.

Possible Indicators:

Signs of various types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender or ethnicity or nationality. Whilst by no means exhaustive, this is a list of some common signs:

- Victim is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else;
- The victim has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The victim looks malnourished, unkempt, or appears withdrawn.
- They have few personal possessions and often wear the same clothes
- What clothes they do wear may not be suitable.
- The victim is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them. If they do speak, they are inconsistent in the information they provide, including basic facts such as the address where they live.
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work. Many victims will not be able to speak English.
- Fear of authorities.
- The victim perceives themselves to be in debt to someone else or in a situation of dependence.

Children Missing from Home

Children may run away from a problem, such as abuse or neglect at home or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation, FGM, forced marriage or travelling to conflict zones. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation or to drug and alcohol abuse. NGTC has a duty to notify the relevant local authority and partners of students withdrawn from education.

Bullying

While bullying between children and young people is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people. Bullying someone because of their age, race, gender, sexual orientation disability and/or transgender will not be tolerated as NGTC operates a zero tolerance approach. Bullying can take many forms and includes:-

- Emotional:** Being excluded, tormented (eg hiding things, threatening gestures)
- Physical:** Pushing kicking, punching or any use of aggression and intimidation.
- Racial:** Racial taunts, use of racial symbols, graffiti, gestures.
- Sexual:** Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti.
- Verbal:** Name calling, spreading rumours, teasing.

Cyber: All areas on internet, such as email and internet, chat room misuse, mobile threats by text message and calls. Misuse of associated technology ie camera and video facilities, sexting.

Please refer to the Harassment and Bullying of Learners policy.

4. Culture of Safety

We are committed to building a 'culture of safety' in which learners are protected from abuse and harm in all areas of its service delivery.

Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.

Candidates are informed of the need to carry out enhanced criminal records checks (DBS checks) before posts can be confirmed. Where applications are rejected because of information that has been disclosed, applicants have the right to know and to challenge incorrect information.

We undertake criminal record checks for staff and volunteers, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.

We take security steps to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the young people or vulnerable adults. We have procedures for recording the details of visitors to NGTC.

5. Roles and Responsibilities

All adults working with or on behalf of our learners, including young people and vulnerable adults have a responsibility to safeguard and promote the welfare of them.

All staff will be informed of their responsibilities in being alert to the signs of abuse. Any concerns should be shared with the designated member of staff for child protection. The Designated Members of Staff for Safeguarding will receive training at least every two years.

All other staff who will have contact with children and young people will receive safeguarding training every three years.

Statistically young people with behavioural difficulties and disabilities are more vulnerable to abuse, staff need to be particularly sensitive to signs of abuse in these young people.

Staff will be provided with relevant information on a need to know basis about individual young people and vulnerable adults to keep them vigilant to any specific needs.

NGTC will support staff by providing an opportunity to talk through their anxieties with the Designated Members of Staff for Safeguarding.

6. Procedures

Parents and carers may access NGTC's safeguarding policy. We will endeavour to discuss our concerns with parents and carers and seek their consent to refer concerns unless we feel that to do so would place a child at risk of, or cause further significant harm.

In all other circumstances, the parents must be informed at the earliest opportunity, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place.

If a child does not want their family informed then seek advice from a member of the Safeguarding team/Social Services/Police.

Clear guidelines and procedures for Safeguarding are displayed across NGTC, in NGTC publications, including the Student Handbook (available electronically on NGTC Mobile App).

Where it is believed that a young person / vulnerable adult is in need, is suffering from, or is at risk of significant harm, the policies and procedures set by Wigan Safeguarding Children Board <https://www.wigan.gov.uk/WSCB/index.aspx> further defined in the Local Authority Education Safeguarding Guidance, or the Local Vulnerable Adults Safeguarding Board will be followed.

Telephone referrals to the relevant service for children/young people and adult social care for those over 18 years of age will be followed up in writing using the relevant form within 24 hours.

Written records of any concern regarding a young person's/ vulnerable adult's safety will be kept centrally in a file in a locked cabinet.

NGTC recognises that we do not have the responsibility to investigate cases of suspected abuse.

NGTC will co-operate with and share information with relevant external agencies in any enquiries regarding safeguarding matters, including representation at case conferences, core groups and multi-agency planning meetings as required. We will seek consent to share information from the parent or carer unless to do so would place a young person or vulnerable adult at risk of, or cause further significant harm or would compromise the Safeguarding process.

All staff will make it clear to any young person or vulnerable adult disclosing information that they cannot guarantee confidentiality, but they will only pass the information on to the people that can help them.

Information concerning young people and vulnerable adults at risk will be shared with all members of staff on a "need to know" basis. A Designated Member of Staff for Safeguarding will make a judgement in each individual case about who needs and has a right to access particular information.

Where there are concerns about a young person or vulnerable adult, a member of staff may be asked to keep a log of observations. This will be kept securely and transferred to the HR Manager with responsibility for Safeguarding.

All Safeguarding records are subject to the Data Protection Act (1998). If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

7. Allegations against staff and adults in a position of trust

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

N.B. Guidelines set out within NGTC's Disciplinary Procedure will be adhered to for internal investigation purposes.

If a young person or vulnerable adult makes an allegation against a member of staff at NGTC the Principal must be informed immediately.

If the Managing Director is implicated in the concerns you should discuss your concerns with the Local Authority Child Protection Officers who will initiate appropriate action in the same manner as allegations made against other staff in school and inform the Safeguarding Designated Lead Governor at the end of their enquiries.

If you have safeguarding or child protection concerns relating to the parents/carers of children and you are aware that they work with children, young people or vulnerable adults, you must inform the designated staff for child protection. This will allow for consideration to be given as to whether the position of trust process needs to be applied

If an allegation of abuse is made against a member of staff in work based provision not directly linked to NGTC, it must be reported to the Police. The HR Manger must be informed.

The member of staff should have no contact with the young person concerned and must not be informed of the allegation prior to referral.

Any individual (including volunteers, paid employees and those in work based placements) who come into contact with young people and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

The Children Act 2004, through the Stay Safe outcome places a duty upon organisations to promote the well being of young people. This includes the need to ensure that all adults who work with or on behalf of young people in these organisations are competent, confident and safe to do so.

The majority of adults who work with young people and vulnerable adults act professionally: Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact which would lead any reasonable person to question their motives and intentions.

It is recognised that working with young people and vulnerable adults can result in tensions between adults and the learner concerned such that misunderstandings can occur, and it is here that the behaviour of adults can give rise to allegations of abuse being made against them. NGTC has robust staff conduct guidance to ensure staff are aware of their responsibilities when interacting with children, young people and vulnerable adults.

However, allegations may be genuine and research shows that there are adults who will deliberately seek out, create or exploit opportunities to abuse young people and vulnerable adults.

It is therefore essential that all possible steps are taken to safeguard young people and vulnerable adults, and that adults working with them are safe to do so.

It is acknowledged that individuals may have concerns about the possibility of an allegation being made against them and for that reason it is important that they familiarise themselves with behaviours that may be considered as constituting gross misconduct and misconduct, and those which would be considered illegal.

Circumstances where misunderstanding may arise:

- Dress and appearance
- Personal living space
- Gifts, rewards and favouritism
- Communication with young people and vulnerable adults (including the use of technology)
- Social contact
- Sexual contact
- Young people and vulnerable adults in distress

Where an allegation has been made against a member of staff which calls into question their ability to safeguard and promote the welfare of young people and vulnerable adults, their suitability to work with these learners and is likely to result in a breakdown of public confidence, these will be investigated in line with the appropriate Wigan Safeguarding Board Procedures.

The Local Authority Designated Officer – LADO

Working Together 2010 requires agencies that are members of the Local Safeguarding Children's Board to have identified individuals within their agency who are responsible for the management of allegations against members of staff (Managing Director and the HR Manager)

The Local Authority Designated Officer (LADO) will be notified of all allegations against adults in position of trust at NGTC. The LADO has overall responsibility on behalf of Wigan Local Safeguarding Children's Board for managing such allegation, regarding young people.

8. Power and Positions of Trust

All adults working with young people and vulnerable adults are considered to be in a position of trust, as a consequence of their knowledge, position and/or the authority invested in their role. This equally applies to volunteers.

This means that adults should **not**:

- Use their position to gain access to information for their own or other's advantage.
- Use their position to intimidate, bully, humiliate, threaten, coerce or undermine young people / vulnerable adults

- Use their status and standing to form or promote relationships which are of a sexual nature or may become so.

This means that adults should:

- Ensure that an unequal balance of power is not used for personal advantage or gratification
- Maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- Report or record any incident where their behaviour may be misinterpreted with a Senior Manager at the earliest opportunity

9. Propriety and Behaviour

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people and vulnerable adults with whom they work or come into contact with. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and with their colleagues.

There may be times, for example, when an adult's behaviour or actions in their personal life come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or indicate an unsuitability to work with young people or vulnerable adults. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour. The behaviour of an adult's partner or other family members may raise similar concerns and require careful consideration by NGTC as to whether there may be a potential risk to young people and vulnerable adults within the workplace.

This means that adults should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model, or
- Make or encourage others to make unprofessional comments which scapegoat, demean or humiliate

This means that adults should:

- Be aware that behaviour in their personal lives may impact upon their work with young people and vulnerable adults
- Follow codes of conduct as deemed appropriate by NGTC
- Understand that behaviours and actions of their partner (or other family members) may raise questions about their suitability to work with young people and vulnerable adults

What happens when an allegation is made against a member of staff?

On receipt of a concern/allegation about an individual the following processes should be followed.

- whether it is a matter that can be properly dealt with under NGTC's disciplinary procedures or whether the Police and/or Children's Social Care might need to be involved. Where the view is taken that the Police and/or Children's Social Care should be involved, a Strategy Discussion will take place in accordance with Wigan Safeguarding Children Board Procedures;
- whether the parents/carers of the young person / vulnerable adult are aware of the allegation and in the event that they are not, how and by whom they should be informed. Parents may need to be informed immediately in specific circumstances, such as where a learner is injured or in need of medical attention. In all other circumstances, the parents must be informed at the earliest opportunity, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place;
- what support the learner and their parents/carers may require;
- how and by whom the adult against whom the allegation has been made is informed about the nature of the allegation and what will happen next. Ideally this should happen as soon as possible, except where the decision has been taken to involve the Police and/or Children's Social Care, in which case this should not happen before the Strategy Discussion/Meeting has taken place;
- where the individual subject to the allegation is a member of a Union or professional body they should be advised to seek the advice, support and representation of that body at the earliest opportunity;
- where the allegation relates to the use of physical intervention within NGTC, this must be considered alongside the physical intervention procedures and the extent of what training the individual has undertaken in respect of de-escalation and safe handling techniques, and
- where it is concluded that there should be further enquiries by Police and/or Social Care a recommendation as to whether the member of staff should be suspended will also be made, and whether there are any constraints and limitations on the information that the member of staff can be given about the allegation.
- Whilst enquiries are being made every effort is made to maintain confidentiality and to guard against publicity. If there is any indication of actual or potential media attention the LADO and Principal will liaise with NGTC's communication and publicity personnel.
- If the outcome of the Strategy Discussion is that the threshold of significant harm has been reached then a Strategy Meeting will be convened by Social Care. Equally, where the complexity of the case warrants a Strategy Meeting, one will be convened.

What will a Strategy Meeting consider?

Multi-agency enquiries have three related but independent strands:

- child protection enquiries relating to the safety and welfare of any children who are or may have been involved;

- a Police investigation into a possible criminal offence, and
- A disciplinary procedure where it appears that the allegation may amount to misconduct, gross misconduct or raises concerns about the capacity or suitability of the employee to work with children or young people.

Consideration has to be given to how NGTC's setting manages the potential risks to the learner associated with the allegation and other learners with whom the adult may come into contact. This can include their own children, children of extended family members, and other settings e.g. scout group, youth organisation, church etc., where children attend and the adult is seen to be in a position of trust.

Suspension of the individual will be considered, especially where there is cause to suspect that a learner is at risk of significant harm, the allegation warrants investigation by the Police or is so serious that there might be grounds for dismissal. Serious consideration must be given to the circumstances of the case before a decision to suspend an individual is taken.

Suspension of a Staff Member whilst Enquiries are Taking Place

Suspension is a neutral act taken by the employer, to provide a safe environment for the individual against whom the allegation has been made, learners and NGTC, whilst multi agency enquiries are undertaken.

Suspension can only be carried out by the Managing Director or a designated senior member of staff.

Individuals will be kept advised at each stage of the enquiries, and every effort will be made to ensure that the process is open and transparent.

Once the enquiries have concluded individuals will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.

In the event that the individual is the subject of a criminal investigation, which could lead to prosecution, the decision to inform the individual of this will be taken jointly by the Police and other relevant agencies at a Strategy Meeting.

Every effort is made to complete the multi agency enquiries in a timely manner, however, each of the three strands identified above, must have been concluded before an enquiry can be closed by the LADO.

What happens once the enquiries have been concluded?

Where the allegations have **not been substantiated** the employee will be reinstated to their duties.

Where the allegations have **been substantiated** then the LADO and the Principal will consider whether a referral should be made in respect of the employee to the appropriate professions governing body (Institute for Learning, etc) and/or to the Independent Safeguarding Authority, who will consider whether the individual should be "barred" from working with children and young people.

Irrespective of whether allegations have or have not been substantiated a clear and comprehensive summary of the allegation, the enquiries undertaken, and a clear account of decisions taken and reasons for them will be held securely upon the employee's confidential personnel file. The record will be held at least until the person has reached normal retirement age or for a period of ten years after the allegation was made, if this is longer. The responsibility for making sure that this happens is NGTC Managing Director.

10. Physical Contact and Physical Intervention

Not all young people and vulnerable adults feel comfortable about physical contact. Adults should not make the assumption that it is acceptable practice to use touch as a means of communication. Wherever possible, young people and vulnerable adults should be advised before physical contact or intervention is made.

It is recognised that some young people / vulnerable adults who have experienced abuse may seek inappropriate physical contact and adults should be particularly aware of this when it is known that a learner has suffered abuse.

In this circumstance careful consideration should be given to the needs of the learner. Details of the learner and his / her additional needs must be reported to the HR Manager with responsibility for Safeguarding.

Physical Intervention

NGTC's policy on the use of physical intervention is detailed within the Health and Safety policy. It applies strictly to the application of physical intervention in the case of persons with an identified learning disability or severe challenging behaviour and adheres to the Department of Health's Guidelines for the Use of Physical Intervention.

11. Learners Accessing Alternative Provision

Where learners are accessing NGTC as part of alternative school provision any safeguarding concerns will be reported to a member of NGTC's Safeguarding Team. This team will liaise closely with the Designated Officer from the young person's mainstream school, who will take the lead on the safeguarding case.

There are occasions when young people and vulnerable adults are placed in settings outside NGTC.

Young people and vulnerable adults are more vulnerable to abuse or harm in these situations than in short term placements, and therefore child protection arrangements are a relevant concern for longer term placements. Additional safeguards will be necessary for placements when one or more of the following conditions apply. The placement is:

- for more than one day per week;
- for longer than one term in any academic year;
- aimed at those who may be vulnerable, e.g. those who have special needs or are young (aged under 16);
- one where the workplace supervisor or a colleague will have substantial unsupervised access to the child, because of the nature of the business (i.e. micro business, sole trader or journeyman); or
- One which has a residential component.

All Learning Providers working with young people therefore have a duty of care to ensure Safeguarding policies and procedures are in place and followed by their employees and volunteers. To do this we will ensure that we:

- Create and maintain an environment in which young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Include curriculum activities and opportunities to enable students the opportunity to attain skills and attitudes, to help them resist abuse in their own lives and to prepare for the responsibilities in their adult lives, including parenthood.
- Communicate a clear model of management of suspected or disclosed abuse.

12. Strategic Responsibilities for Safeguarding learners on Placement

If any of the above conditions apply, the following safeguards should be in place at a strategic level:

- NGTC staff who arrange, vet, or monitor work placements will have had training in child protection;
- Employers taking responsibility for a young person or a vulnerable adult on a long-term placement will be asked to make a commitment to safeguarding their welfare by endorsing an agreed Safeguarding policy or statement of principles.
- Any person whose normal duties will include regularly caring for, training, looking after or supervising a child in the workplace should be vetted and subject to DBS Disclosures to ensure s/he is not disqualified from working with children or otherwise unsuitable to be responsible for them. This should not include people who will have contact with the child simply because s/he will be in the same location, or as part of their work. It is intended to apply to people who are specifically designated to have responsibility for looking after, supervising or directly training a child or children throughout the placement.
- DBS Disclosures will be arranged by NGTC, and the person will be regarded as a volunteer for the purpose of the Disclosure.
- That person will also be given basic Safeguarding training to be aware of their responsibilities. They should be given details of a person to contact in the event that there are any concerns about a learner for whom they are responsible.
- The learners who are placed in these settings will also be given clear advice about who to contact if they are worried or uncomfortable about their surroundings or if they suffer abuse. They will have a continuing point of regular contact within NGTC and be given opportunities to raise any concerns they may have.

- If a concern is raised regarding a young person or vulnerable adult who is on a long term placement, then the normal NGTC Safeguarding procedures will apply.
- In some cases it is also important to ensure that the learner concerned is suitable for the placement (for example, when placing young people in environments involving them working with younger children). In these circumstances DBS Disclosures may be required.

13. Preventative Work

As part of developing a healthy, safer lifestyle, young people and vulnerable students will be taught:

- to recognise and manage risks in different situations and then decide how to behave appropriately (including those within the digital world)
- to judge what kind of physical contact is acceptable and unacceptable
- to recognise when pressure from others (including people they know) threatens their personal safety and develop effective ways of resisting pressure, including knowing where and when to get help
- to use assertiveness techniques to resist unhelpful pressure
- Our learners should feel valued, respected and able to discuss any concerns they have. NGTC will seek to create an environment where this can be achieved.

Prevention of young and/or vulnerable people becoming extremist or being radicalised

Prevent is one of four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of young and/or vulnerable people. In 2011, the government strategy of PREVENT was implemented.

The Prevent strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

The Counter-Terrorism and Security Act (2015) placed a duty on further education colleges and training providers to have due regard to the need to prevent people from being drawn into terrorism.

NGTC has a responsibility to ensure that all staff and students have knowledge in recognising risk and addressing it appropriately. Strategies to meet this obligation include:

- To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism
- Staff Induction and briefing sessions
- Enrichment sessions
- To create opportunities for open discussion and to listen and support the learner voice
- To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
- Promotion of British values, namely democracy, rule of law, individual liberty, tolerance and respect for others.
- To ensure student safety and that NGTC is free from bullying, harassment and discrimination
- To provide support for students who may be at risk and appropriate sources of advice and guidance

Staff and Student Training

- **Zak Simulation** - offers staff and students the opportunity to learn about on key aspects of online radicalisation and grooming, gaining an insight into the process and implications for the victim and groomer. This is an interactive and immersive simulation, based upon real cases and research. Students will learn how to keep themselves safe and to spot the signs if someone close to them is being groomed.
- A member of the Safeguarding team is Home Office trained to deliver the **Workshop to Raise Awareness of Prevent (WRAP3) training to staff**. WRAP 3 training is a general awareness course that will enable staff to recognise signs, and to know what action to take in response to concerns. All staff will be offered this training in order to understand factors which make students vulnerable to extremist ideas and know what action they should take.

Referral

Identification of Concern - In the event of noticing changes about a student that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, staff need to the Prevent Lead, Karen Green. The Safeguarding team will take action on a case-by-case according to the information given to them. The team will make any assessments or external referrals as required.

14. Fitness to Study guidelines (Supporting learners with mental health needs)

NGTC is committed to supporting student wellbeing and realises that a positive approach to the management of physical and mental health issues is critical to student learning and academic achievement. Additionally, NGTC has a duty of care to all within its community and a responsibility to take action to support those in distress, or causing significant concern and presenting a risk to self and others. This will include, for instance, situations where students show visible signs of illness, mental health difficulties or emotional disorders that may have a negative impact on the health, learning and wellbeing of others.

These guidelines have been written to ensure that a suitable response is given when it is not considered appropriate to apply disciplinary procedures. This may arise when a student's behaviour requires considered and sensitive management rather than disciplinary action.

Instances where Fitness to Study procedures may also be implemented include:

1. Where there are a number of worrisome third party reports regarding a student e.g. friends, staff
2. A student has not engaged in studies for a significant period without an apparent reason
3. There is a concern about how a student might manage whilst on a placement or a trip

The procedure has 3 levels of concern. The causes for concern can result in entering the procedure at any level

Level 1

Concerns emerge about a student's health and safety and ability to study based upon deterioration in health, appearance, attitude or behaviour

- a. A member of staff who knows the student (e.g. tutor) should approach the student in a supportive way and indicate that there is concern about the student's fitness to study. The nature of the concern should be clearly identified and if appropriate information should be given about appropriate internal / external support. It should be made clear to the student that it is their responsibility to be fit to study and that there is a recognised concern within NGTC. If the student is below the age of 18 concerns should be shared with parents / guardians.
- b. The student and staff member should agree on actions to be taken and time should be set for a follow up meeting. This should be recorded on e tracker

Level 2

Continued concern about a student's health and safety and ability to study related to a significant deterioration in appearance, health and / or behaviour, or significant initial concern about a student.

- The student will be invited to attend a meeting with the HR Manager with responsibility for Safeguarding and the member of staff expressing concern. The student should be given 3 day's notice and will be advised that they can bring a friend, family member or a member of the Student Union/ Student Liaison team
- The purpose of the meeting will be to ascertain the student's perceptions of the issues identified and also to ensure that the student clearly understands NGTC's expectations regarding Fitness to Study. It will be important to identify and agree an action plan following the meeting, which may include support from the Welfare or Additional Needs Officer. A summary of the meeting along with the action plan should be sent to the student within 5 days. If the student is below the age of 18 parents / guardians should be invited to the meeting and should be sent a copy of the summary and action plan.

Level 3

The most serious level of concern can be reached either through progression from levels 1 and 2 or directly if there are significant concerns about the health and safety of the student or others.

- a. A case conference will be called by the HR Manager with responsibility for Safeguarding to ascertain the facts of the case as known and discuss an appropriate course of action. The Chair will be the HR Manager with responsibility for Safeguarding and the panel will consist of a member of the Welfare Team and a member of the Additional Needs team. Witnesses may be called to provide evidence.
- b. The student will be invited and may bring a friend/family member
- c. The case conference may consider various options, including part time study (where possible), the support needed by a student or a recommendation for withdrawal or exclusion of a student.
- d. The actions arising from the case conference will be documented and the ET PA will be notified. The student will be notified within 5 working days of the outcome.
- e. If the case conference considers that withdrawal or exclusion is the best form of action this will need approval by the HR Manager

The student has the right to appeal against this level 3 outcome. Appeals must be made to the Managing Director and procedures should be followed from section 8 in this policy

15. Appendices

- 1. Safeguarding Leads**
- 2. Actions to take when abuse is disclosed**
- 3. Actions to take when abuse is suspected**
- 4. List of Safeguarding Officers**
- 5. Related Policies**
- 6. Safeguarding reporting form**
- 7. Key Contacts list**
- 8. Safeguarding Do and Don'ts**

Appendix 1

Safeguarding Leads

Designated Person: Karen Green (HR Manager)

Deputy Designated Person: Mike Needham (Managing Director)

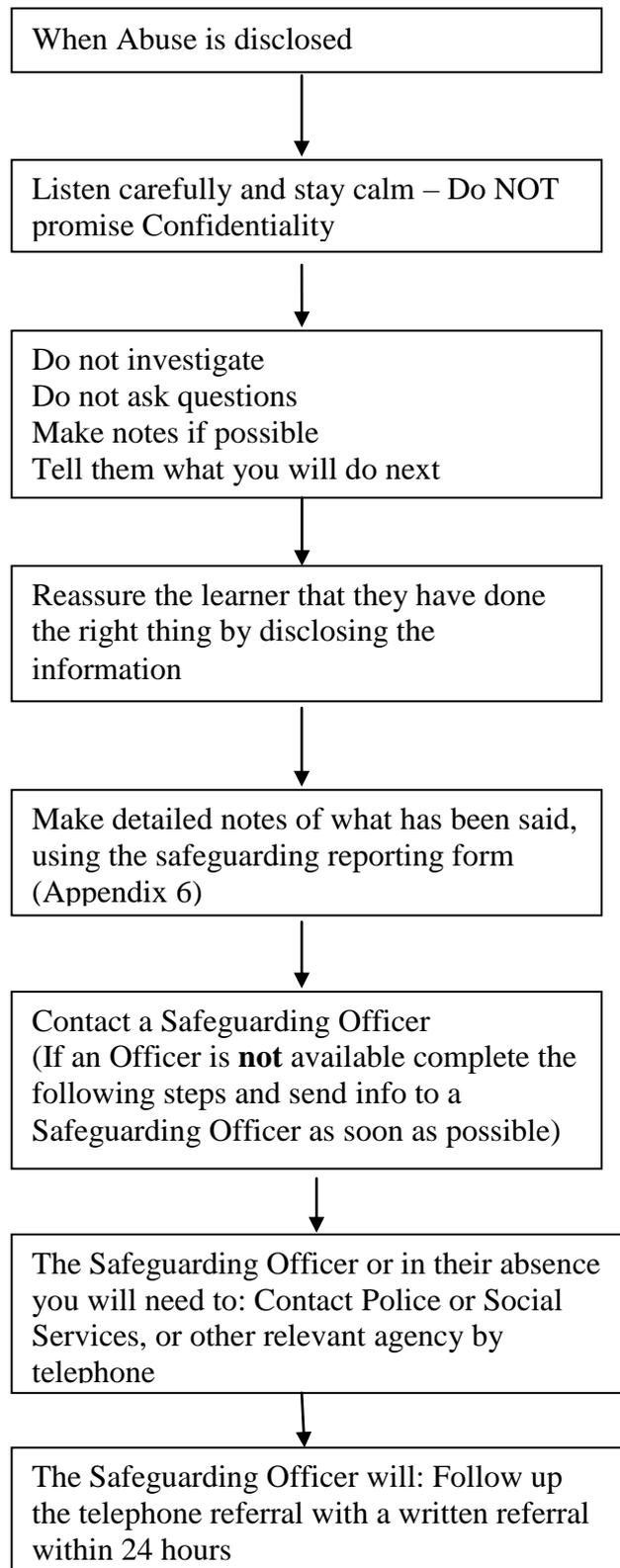
Staff with responsibility for their curriculum area:

Mark Green
Joe Wooder

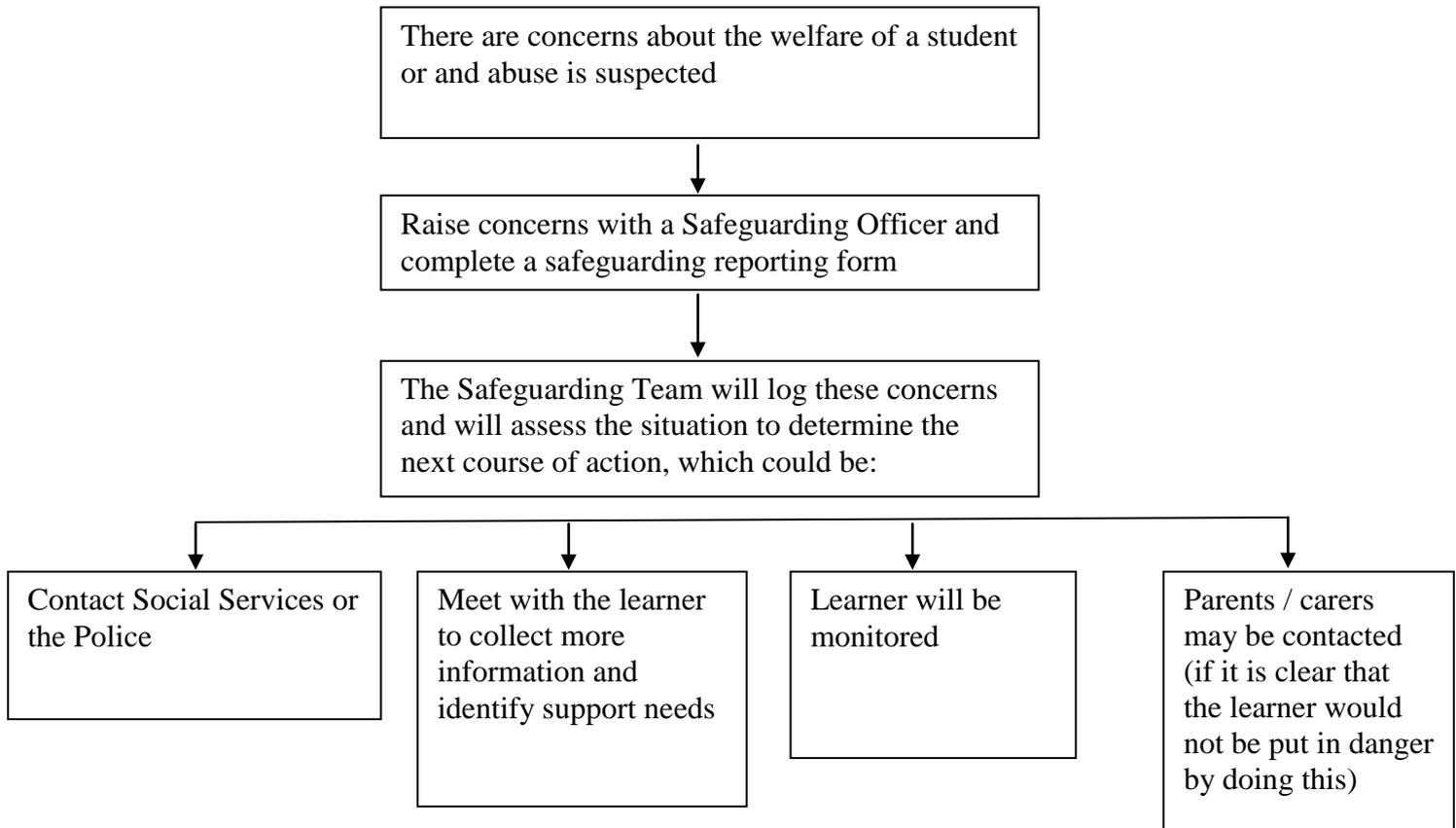
Appendix 2

Flow chart of procedures for reporting suspected abuse

ACTIONS TO TAKE WHEN ABUSE IS DISCLOSED



Actions to take when abuse is suspected



Appendix 4

List of Safeguarding Officers

Karen Green	HR Manager
Mike Needham	Managing Director

Do NOT use email to report serious concerns. If you do send an email send to the designated Safeguarding email address*: Safeguarding@ngtc.co.uk

*Use Appendix 6 to guide you to include all the relevant information about the student and concern. As a **minimum** this should include the basic details of Student Name, Age, DOB and Person Code.

Appendix 5

Related Policies:

Staff and Student Disciplinary
Equal opportunities
Health and safety
Recruitment and selection
Health and safety
Recruitment and selection
Prevent Policy

**Appendix 6
Safeguarding Incident/Concern Referral Form**

Safeguarding and Vulnerable Learner Incident/Concern Referral Form



Student Name		Person Code	
Date of Birth			
Course			
Member(s) of staff noting concern/disclosure			

Date & time of concern/disclosure	
Details of concern/disclosure/incident (please describe as fully as possible)	

Other relevant staff involved (including agencies such as social services, police etc)

Please pass this form to a member of the Safeguarding Team once completed

Appendix 7

Key Contacts

Staff and Professional Concerns

Wigan Local Authority Designator Officer (LADO) 01942 486042

Emergency

Wigan Contact Centre
(Concerns re children and young people) 01942 828300

Wigan Adult Social Care
(Concerns about adults) 01942 828777

Forced Marriage Unit 020 7008 0151

Greater Manchester Police 999, or 101

Other Organisations

NSPCC Helpline 0800 800 5000

Child line 0800 1111

24 hour National Domestic Violence Freephone Helpline 0800 2000 247

Shelter – for housing advice 0808 800 4444

MIND – mental health charity 0845 766 0163

Victim Support 0845 30 30 900

National Stalking Charity 0808 802 0300

Survivors UK - Adult survivors of childhood abuse or male rape 0845 122 1201

NB - All Contacts checked and correct – November 2017. Please contact a member of the Safeguarding Team if found to be incorrect or changed.

Appendix 8

Safeguarding Do and Don'ts

- Do find out who the designated safeguarding officer is and who the safeguarding team are.
- Do ensure that the person is not in immediate danger, if they are seek Police or medical assistance (999).
- Do find a quiet, secure area for you and the learner.
- Don't place yourself or anyone else in danger.
- Never promise confidentiality – you will have to break it and with it the person's trust in you.
- Do remember, that the child, young person or adult may not want their family informed. In this instance seek advice from a member of the Safeguarding team/Social Services/Police.
- Do not interfere with, or contaminate potential evidence following a physical or sexual assault, for example, by get the learner to wash, change clothing etc.
- Do listen and stay calm, you need to listen without making assumptions or judgements.
- Do not interview the child, young person or adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words in their mouth.
- Do reassure that by telling you, they have done the right thing.
- Do inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of whom you will report the matter to.
- Do not investigate concerns or allegations yourself, but report them immediately to a member of the safeguarding team.
- Don't, in any circumstances, discuss the issue with the alleged perpetrator(s).
- Don't do nothing - tell Safeguarding or the relevant authorities immediately.