



## SAFEGUARDING VULNERABLE ADULTS POLICY AND PROCEDURE

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Person(s) responsible for policy	Principal
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At Valley College, safeguarding is the responsibility of all staff including Trustees, Directors, and both employed and voluntary staff, and as such permeates all aspects of college life. The purpose of this policy is to ensure that everyone at Valley College is safe and protected from harm, and means that we will always work in partnership so that everyone is:

- Safe and able to protect themselves from abuse and neglect
- Treated fairly and with dignity and respect
- Protected when they need to be
- Able easily to get to the support, protection and services they need.
- Confident that their 'voice' is being heard

Adult Safeguarding means protecting a person's right to live in safety, free from abuse and neglect.

The aims of adult safeguarding are to:

- Stop abuse or neglect wherever possible;
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs;
- Safeguard adults in a way that supports them in making choices and having control about how they want to live;
- Promote an approach that concentrates on improving life for the adults concerned;
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect;
- Provide information and support in accessible ways to help adults understand the different types of abuse, how to stay safe and what to do to raise concerns about the safety or wellbeing of an adult; and
- Address what has caused the abuse.

A vulnerable adult is a person who is aged 18 years or over who may be unable to take care of themselves, or protect themselves from harm or from being exploited. This may be because they have a mental health problem, a disability, a sensory impairment, are old and frail, or have some form of illness

The protection of vulnerable adults contributes to the wider safeguarding agenda, and this policy operates in conjunction with statutory guidance for reporting concerns.

<https://www.lancashire.gov.uk/health-and-social-care/adult-social-care/report-a-concern-about-an-adult/>

Additional legislation and statutory guidance relative to safeguarding vulnerable adults (Note: this list is not exhaustive)

- Counter Terrorism and Security Act 2015
- Modern slavery Act 2015
- Care Act 2014
- Mental Capacity Act 2005
- Human Rights Act 1998
- No Secrets Act 2000 (Department of Health)
- Association of Directors' of Social Services: Safeguarding Adults National Framework of Standards 2005

### **Ethos**

- ALL staff, volunteers and directors contribute to an ethos where learners feel secure and safe
- ALL learners have opportunities to communicate and know that they are listened to
- ALL learner's wishes, feelings and views will be taken into account when decisions are being made about how to keep them safe
- ALL learners know that they can communicate with any staff in college if they are worried or in difficulty
- ALL staff and volunteers will contribute to providing a curriculum which will equip learners with the skills they need to stay safe and be able to communicate when they do not feel safe
- ALL staff and volunteers will contribute to providing a curriculum which will help learners develop an attitude which will enable them to continue into adulthood successfully and reach their full potential
- ALL staff, volunteers and directors will establish effective, supportive and positive relationships with parents, carers, learners and professionals

### **Roles and responsibilities**

Valley College is committed to providing the relevant personnel with clear and explicit roles and responsibilities to ensure accountability when safeguarding learners. We therefore ensure that:

All adults, including volunteers, working in or on behalf of the Valley College will:

- Demonstrate an understanding that safeguarding is everyone's responsibility
- Maintain and demonstrate a mind set of "it could happen here"
- Do all they can within the capacity of their role, to ensure that learners are protected from harm
- Do all they can within the capacity of their role, to ensure that learners develop in circumstances consistent with safe and effective care
- Do all they can within the capacity of their role, to ensure that learners have the best outcomes

- Report cases of suspected abuse to a DSL. This will be done as soon as possible using the Valley College's agreed format
- Report lower level concerns to a DSL using the Valley College's agreed format
- Monitor all learners, particularly those that are deemed vulnerable
- Report any concerns regarding adults conduct to a DSL
- All staff, if they have concerns, should act immediately and should always speak to a DSL. Early information sharing is vital in keeping vulnerable adults safe. In exceptional circumstances staff should consider speaking to Adult Social Care to discuss safeguarding concerns if a DSL is not immediately available.
- All staff should be aware of the process for making referrals to Adult social care

The Directors will:

- Ensure that the policies, procedures and training in Valley College are effective and comply with the law at all times
- Ensure that safeguarding policies and procedures are followed by all staff
- Put in place safeguarding responses in cases where learners go missing from education
- Appoint a DSL and back-ups and ensure that they are provided with appropriate support, funding, resources and time to carry out their role
- Ensure the college contributes to inter-agency working in line with statutory guidance
- Ensure that safeguarding procedures take into account local guidance including Risk Management Toolkit and Lancashire Continuum of Need and Thresholds Guidance
- Ensure that staff members undergo safeguarding training at induction
- Ensure that DSLs and all staff, volunteers and directors are trained and updated regarding safeguarding regularly with reference to the principles of Keeping Children Safe in Education.
- Ensure that learners are safe online by ensuring that appropriate filters and monitoring systems are in place
- Ensure that learners are taught about safeguarding
- Prevent people who pose a risk of harm from working with learners
- Ensure there are procedures in place to handle allegations against staff, and volunteers
- Ensure staff in college are aware of, and policies reflect, an understanding of specific issues such as adult on adult abuse and safeguarding vulnerable adults with disabilities and special educational needs
- Ensure that all practice and procedures operate with the best interests of the learner at their heart
- Ensure that all staff are aware of safeguarding issues and vulnerabilities associated with care leavers

The DSLs will:

- Take lead responsibility for safeguarding
- Manage referrals to Adult Social Care, Police and other agencies
- Work with others in order to improve outcomes for learners
- Attend DSL training every 2 years
- Undertake Prevent awareness training annually with the Prevent Lead undertaking additional relevant training and attendance at NW Regional Prevent forum meetings.
- Update their skills and knowledge on a regular basis, but at least annually
- Raise awareness of safeguarding throughout Valley College

- Ensure that this policy is reviewed annually and is available publicly
- Maintain, update and amend the safeguarding portfolio regularly
- Ensure that parents and carers are aware of Valley College's responsibilities regarding safeguarding
- Maintain accurate safeguarding records that are stored securely
- Be available during Valley College hours
- Arrange cover of DSL role for any out of hours/out of term activities
- Represent Valley College in multi-agency meetings
- Be provided with appropriate support and supervision in order to carry out the role safely and effectively
- DSLs must take a holistic view to ensure wider environmental factors are considered which may be a threat to safety and welfare of learners (Contextual Safeguarding).
- The DSL will consider when a learner is moving from/leaving Valley College if it would be appropriate to share information in advance of the learner moving from/leaving.
- The DSL should have details and liaise with the Local Authority Personal Advisors for any Care Leavers.
- Act as a Single Point of Contact for safeguarding partner organisations
- Refer cases of suspected abuse to the local authority adult social care as required
- Refer cases to the Channel programmes where there is a radicalisation concern as required
- Refer cases where a crime may have been committed to the Police as required.
- Attend weekly catch up and termly DSL meetings
- Liaise with staff on matters of safeguarding and safety such as online safeguarding.
- Act as a source of support, advice and expertise for all staff
- Understand the assessment process for providing statutory intervention, including local criteria for action and local authority social care referral arrangements

### **Induction, Training and Updates**

Valley College is committed to providing staff and volunteers with the skills and knowledge needed to safeguard learners. We therefore ensure that:

- ALL staff and volunteers will receive Level 1 & 2 Safeguarding Training on induction.
- Staff induction will include the Safeguarding Policy, Staff Conduct Policy and Learner Conduct Policy
- ALL staff and volunteers will receive Level 1 & 2 Safeguarding Training annually
- The DSL/s will provide ALL staff, volunteers and directors with regular safeguarding updates informed by statutory and LSAB guidance
- ALL staff, volunteers and directors will read and show an understanding of any updates that are provided
- DSLs will update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis
- All college staff including Directors will undertake Prevent awareness training annually.
- At least one member of staff will attend Safer Recruitment Training. This will be renewed at least every 2 years
- ALL staff, volunteers and directors will undertake any additional training on matters such as Child Sexual Exploitation, Prevent, Adult on Adult abuse, Online safeguarding etc

- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL/s

Valley College is committed to PREVENTING abuse, PROTECTING learners from abuse and SUPPORTING those involved in cases of abuse. We therefore ensure that:

- ALL staff and volunteers understand the importance of teaching learners how to keep themselves safe from all types of abuse
- ALL staff and volunteers seek out opportunities that are relevant to their role, to teach learners the skills to keep themselves safe
- ALL staff and volunteers make and maintain positive and supportive relationships with learners which enable them to feel safe and valued
- Safeguarding has a high status throughout Valley College by being on the agenda at staff meetings/briefings, information being readily available on notice boards, regular updates
- ALL staff feel confident in approaching DSLs to raise concerns
- ALL staff and volunteers have an understanding of the four categories of abuse, NEGLECT, EMOTIONAL ABUSE, SEXUAL ABUSE, and PHYSICAL ABUSE.
- ALL staff and volunteers understand that there are other ways in which learners can be abused such as; Online, Sexual Exploitation, Female Genital Mutilation, Honour Based Violence, Radicalisation, Trafficking, Slavery, Adult Abuse, Forced Marriage and others
- ALL staff and volunteers have the knowledge, skills and expertise to recognise the signs and symptoms of all types of abuse
- All staff, if they have concerns, these should be acted on immediately: early information sharing being vital in keeping learners safe. In exceptional circumstances staff should consider speaking to the Principal or Adult Social Care to discuss safeguarding concerns if the DSL is not immediately available.
- DSLs keep up to date with emerging and specific safeguarding issues and update training and the Safeguarding Portfolio accordingly
- DSLs update staff and volunteers' knowledge and understanding of such issues in order for them to be able to identify learners who are at risk of such specific safeguarding issues
- ALL staff and volunteers will maintain and demonstrate an attitude of "it can happen here"
- ALL staff and volunteers are learner-centred in their practice and act in the best interests of the learner at all times
- ALL staff recognise and understand that behaviour can be a learner's way of communicating distress and changes to behaviour may be an indicator of abuse
- ALL staff and volunteers have the skills to respond appropriately and sensitively to disclosures or allegations of abuse
- ALL staff and volunteers report cases of suspected abuse to the DSL. This will be done as soon as possible using the agreed format
- Where a learner is at risk of immediate harm, ALL staff understand that they must refer to the Police or Adult Social Care
- ALL staff and visitors know how to refer to Adult's Social Care
- Consent from the learner will be sought prior to this referral if appropriate, except where this will cause delay or place anyone at risk
- Where consent is not given, the learner is informed that a referral will still be made, except where this will cause delay or place anyone at risk

- DSLs adhere to policy, procedures and guidance from the LSAB with regard to sharing information
- DSLs or another appropriate member of staff, will attend meetings, produce and present reports, liaise with staff, work with parents, work with other agencies and ensure the voice of the learner is evidenced throughout these processes
- A copy of any record is included in the learner's individual safeguarding file
- ALL staff and volunteers will support victims of abuse in a capacity that is relevant to their role. This will be determined by the DSL
- DSLs will determine what information staff members need to know in order to safeguard and support learners. This may be different information for different staff
- Staff are offered appropriate support and/or supervision that is relevant to their role or involvement in particular cases
- Communication and work with parents and carers will always be undertaken in a supportive manner and in the best interests of the learner
- ALL staff understand that learners who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported
- Specific programmes of work and support are offered to learners and families who are vulnerable
- Risk Assessments will be undertaken where a learner's behaviour poses a risk to others, themselves or the environment

### **Specific Safeguarding**

Sources and types of harm:

Harm is defined as ill treatment, including sexual, emotional and financial abuse; impairment of development and/or an avoidable deterioration in physical, mental health; the impairment of physical, emotional, social or behavioural development or the impairment of health;

Conduct which appropriates or adversely affects property, rights, or interests (e.g. theft or fraud)

### **Abuse**

This is a form of maltreatment of a vulnerable adult by another person or persons in a way that causes significant harm or affects health, development or wellbeing. This may be by inflicting harm or by failing to act to prevent harm. Vulnerable adults may be abused in a family, institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). Incidents of abuse may be one-off or multiple and may affect one person or more.

**Serial abuse** where the perpetrator seeks out and 'grooms' an individual

**Long term abuse** in the context of on-going family relationships e.g. domestic abuse

**Opportunistic abuse** such as theft of belongings

### **Bullying (including cyberbullying)**

This is a form of psychological abuse and is behaviour which has a harmful effect on the adult's emotional health, well-being and

### **Sexual Exploitation**

Sexual Exploitation involves exploitative situations, contexts and relationships where young people may receive something (e.g. food, accommodation, drugs, alcohol, gifts or simply affection) as a result of engaging in sexual activities. The perpetrator will not only groom the victim (possibly over a long period of time) but will always hold some kind of power which increases as the exploitative relationship develops. Sexual exploitation involves a degree of coercion, intimidation or enticement, including unwanted pressures from adults to have sex, sexual bullying including online bullying (cyberbullying) and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

- The Valley College curriculum will include relevant information around the risks associated with sexual exploitation
- The Online Safeguarding Policy will ensure the safety of learners by ensuring they cannot access inappropriate material when using the internet and that suitable filtering software is in place

**Discriminatory abuse** is discrimination based on a person's race, faith or religion, age, disability, gender, sexual orientation, or perceived race, faith or religion, age, disability, gender or sexual orientation. It includes slurs or similar, harassment, or excluding a person. It is the exploitation of a person's vulnerability which excludes them from opportunities in society, or causes them to be treated less favourably than any other person based on gender, age, disability, race, religion/faith, sexual orientation, status

**Domestic Abuse** as defined by the Domestic Abuse Act 2021 is

Behaviour of a person ("A") towards another person ("B") is "domestic abuse" if—

- (a) A and B are each aged 16 or over and are personally connected to each other, and
- (b) the behaviour is abusive.

Behaviour is "abusive" if it consists of any of the following—

- (a) physical or sexual abuse
- (b) violent or threatening behaviour
- (c) controlling or coercive behaviour
- (d) economic abuse
- (e) psychological, emotional or other abuse

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

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 the 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.

Please refer to the Valley College Domestic Abuse Guidance for further information.

**FGM (female genital mutilation)** is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons. The procedure is medically unnecessary, extremely painful and has serious health consequences, both at the time of the procedure and also later in life. It is typically performed on girls aged between 4 and 13 but can take place on young women before marriage or pregnancy. FGM is a criminal offence in the UK and the FGM Act 2003 made it an offence for UK nationals or permanent UK residents to carry out or aid, abet, counsel or procure the practice abroad, even in countries where it is legal. The Serious Crime Act 2015 amended the act further creating a statutory duty of Mandatory Reporting of FGM for regulated professionals including teachers/teaching assistants in England and Wales.

- All suspicions of an adult at risk of being prepared for FGM must be raised with the local authority Adults Safeguarding Team.
- ALL staff and volunteers are aware of the "one chance rule" and will report all cases of suspected Honour Based Violence to the DSL immediately
- ALL staff need to be alert to the possibility of when a female pupil may be at risk of FGM or when it may have been conducted on them

**Forced marriage** is a form of domestic abuse and should be treated as such. It cannot be justified on religious grounds and is an abuse of human rights. It can happen to both men and women although most cases involve females aged between 13 and 30 years of age. A clear distinction is made between forced marriage and arranged marriage. In forced marriage, one or both spouses do not consent to the marriage. Anyone threatened with forced marriage or forced to marry against their will, can apply for a Forced Marriage Protection Order. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence to force someone to marry, including taking them overseas to force them to marry (regardless of whether or not the forced marriage takes place) and marrying someone who lacks the mental capacity to consent to the marriage (whether pressured to or not)

- ALL staff and volunteers will have a general understanding of how to identify a learner who may be at risk of Forced Marriage

**Honour Based Abuse**, honour-based crime, or izzat (Urdu word which means protecting family honour) embraces a variety of crimes of violence, mainly, but not exclusively against women, including assault, imprisonment and murder, where a person or persons are punished by family or their community for actual or alleged undermining of what is believed to be the correct code of behaviour.

- ALL staff and volunteers will have a general understanding of how to identify a learner who may be at risk of Honour Based Violence

### **Missing vulnerable adults**

Learners missing can be a potential sign of abuse or neglect including sexual exploitation, undergoing female genital mutilation, forced marriage or travelling to conflict zones.

- ALL staff and volunteers follow procedures when a learner misses education particularly on repeat occasions to help identify the risk of abuse and neglect
- The Attendance Policy is up to date, reviewed annually and references learners repeatedly failing to attend
- There is an admissions policy and an attendance register
- Where reasonably possible Valley College will hold more than two emergency contact number for learners.

- All staff will be aware that missing vulnerable adults can be a warning sign of safeguarding considerations and act on these in line with the policy

**Preventing radicalisation: Channel** is a mechanism which provides support to those who may be vulnerable to violent extremism. It is a means to assess the nature and extent of potential risk an individual may face, and where necessary, provide a package of support tailored specifically to them. This is decided by a multi-agency panel who work in partnership to divert people away from potential risk at an early stage, thus preventing them from being drawn into criminal activity. **Prevent** is part of the UK's counter-terrorism strategy to stop people becoming terrorists or supporting terrorism. It seeks to respond to the challenges of terrorism and to provide practical help in advice and support. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism, there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

- ALL staff and volunteers will have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty'
- ALL staff and volunteers will have a general understanding of how to identify a learner who may be at risk of radicalisation.
- ALL staff and volunteers will use professional judgement in identifying learners who might be at risk of radicalisation and act proportionately following the Learner Protection/Welfare/CHANNEL flowchart within college. All concerns must be discussed with a DSL.
- The Online Safeguarding Policy will ensure the safety of learners by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place
- DSLs understand when it is appropriate to make a referral to the Channel Panel referring to the Prevent referral pathways flowchart. All actions will be recorded appropriately. One to one support sessions within school will be instigated following liaison with the police Prevent team
- All visitors to Valley College will sign in/out using the main Ewood reception visitors' book and be issued with a visitor's badge and appropriate lanyard as per the visitor procedure. Visitors will be accompanied by a member of Valley College staff whilst within the college grounds.

### **Sharing nudes and semi-nudes (Sexting)**

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows the sharing of media and messages. **(Sexting that occurs consensually between two adults is not considered to be a sexual offence and neither of the parties concerned are breaking any laws. However, if a person is sent sexually explicit material and they are not wanted, the sender could potentially be subject to harassment charges)**

- ALL staff are aware to inform the DSL of any concerns.
- The DSL will refer to the flowchart of dealing with incidents of sexting and record any actions taken appropriately

**Trafficking and modern slavery** is illegal and encompasses slavery, human trafficking, forced labour and domestic servitude. A person commits an offence if:

- The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or
- The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour

Human trafficking is the movement of a person from one place to another, using methods of deception, coercion, the abuse of power or of someone's vulnerability and for the purposes of exploitation. It may occur across international borders or within one country and is possible even if consent has been given to be moved.

Modern Slavery: The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking'.

- Staff must be aware of the above and contact the DSL should they suspect or receive information that learners or parents/carers may be victims of modern slavery. The DSL should then contact the NCA

Adults at risk will be referred using safeguarding procedures.

### **Other vulnerable categories**

All staff will be aware of specific forms of abuse and safeguarding issues and vulnerable groups of adults including;

Criminal Exploitation (County Lines)

Homelessness

Gangs and violence

Drugs

Mental Health

### **Sexual violence**

This will also include Upskirting. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress or alarm.

- ALL staff and volunteers understand that adults can abuse other adults
- ALL staff and volunteers will inform the DSL of suspected adult abuse and record in line with colleges recording policy
- Learner on learner abuse will be taken as seriously as any other form of abuse
- All staff understand that abuse is abuse and should never be tolerated or passed off as "banter", or "just having a laugh".
- Physical abuse between learners will be managed under the college's Conduct Policy
- Emotional abuse between learners will be managed under the college's Anti-Bullying Policy

- In cases of suspected or actual learner on learner abuse a risk assessment will be undertaken and appropriate and proportionate control measures put in place to manage and reduce risk.
- DSLs understand that regarding learner on learner abuse, the victim and the perpetrator are likely to have unmet needs and require support and assessment to determine these
- **The DSL will consider:**
  - the wishes of the victim in terms of how they want to proceed
  - the nature of the alleged incident
  - the capacity of those involved to make decisions
  - any power imbalance between those involved
  - is the incident a one-off or a sustained pattern of abuse?
  - are there ongoing risks to the victim, other learners, or college staff?
  - contextual safeguarding issues.
  - **Following a report of sexual violence, the designated safeguarding lead will make an immediate risk and needs assessment, considering:**
    - the victim
    - the alleged perpetrator
    - all other learners (and if appropriate staff).
    - Risk assessments will be recorded and kept under review as a minimum termly.

### **Online safeguarding**

Valley College is committed to keeping learners safe online. We therefore ensure that:

- ALL staff and volunteers understand that learners can be harmed online via hurtful and abusive messages, enticing learners to engage in inappropriate conversations, sharing and production of indecent images or encouraging risk taking behaviour
- The Online Safeguarding Policy details how we keep learners safe when using the internet and mobile technology
- Online bullying by learners, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying / Behaviour Policy
- There is a clear and explicit procedure for dealing with mobile phones that are brought into the learning environment
- DfE advice; Searching, Screening and Confiscation is followed where there is a need to search a learner for a mobile device
- The college has appropriate filters and monitoring systems in place regarding use of internet (3G and 4G) in school.

### **Record Keeping**

Valley College is committed to recording all matters relating to the welfare of learners in a relevant format. We therefore ensure that:

- DSLs will refer to Trust Record Management policy to assist them in creating and maintaining accurate safeguarding records
- There is an agreed format for reporting all matters relating to learner wellbeing,
- ALL staff use the agreed format for passing on concerns

- Concerns should be factual and evidence based
- Concerns should be written in ink, signed and dated and recorded on pink forms
- Concerns should be passed directly to a DSL
- ALL concern logs will be recorded on CPOMS for an individual learner.
- All learners will have an individual welfare/safeguarding file
- DSLs will record all discussions, decisions and rationale behind decisions and sharing of information in the learner's records
- DSLs will record evidence of learner's wishes, professional challenge, offers of help and multi-agency working
- When individual learners are discussed during staff meetings, such as supervision, staff updates or risk assessments etc. learner information should be anonymised or stored in a secure manner
- All safeguarding records will be stored securely in a locked room/cabinet. Reports are made on the secure online system CPOMS.
- Only DSLs will have access to safeguarding records.
- A learner's safeguarding file will be transferred, in its entirety, should this be deemed necessary and proportionate, unless there is ongoing legal action
- The safeguarding file will be hand delivered to the DSL at the receiving establishment. If this is not possible, the safeguarding file will be sent by recorded delivery. A receipt will be obtained
- The safeguarding records will be retained securely until the learner's 25th birthday. Safeguarding records will then be destroyed securely. If appropriate the learner will be asked if they give consent for their file to be shared.

### **Safer recruitment**

Valley College is committed to keeping learners safe by ensuring that adults who work or volunteer in school are safe to do so. We therefore ensure that:

- Human Resources guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff
- At least one staff member has attended Safer Recruitment Training in the last 5 years
- There are at least 2 people on each selection panel and at least one person on every selection panel has attended Safer Recruitment Training
- ALL staff will monitor the conduct of all adults who come into contact with learners and report any concerns to the DSL, Principal or Chair of Directors as appropriate
- Relevant, proportionate and lawful checks are undertaken on all adults who regularly work at, or visit the college
- A Single Central Record is kept of checks that are undertaken on all adults who regularly work at or visit Valley College. As staff are employed by Tor View School, the SCR is retained by the school.
- The SCR is stored securely electronically and only accessed by designated individuals.
- Evidence of a staff member's identity, required qualifications and the right to work in the UK will be kept in individual personnel files.
- Covering (umbrella) letters will be obtained from agencies and other employers that provide staff to work in college.
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer.

- Advice will be sought if any staff are unclear about any aspects of Safer Recruitment.

### **Allegations of Abuse**

Valley College understands that when an allegation is made against a member of staff and volunteers, set procedures must be followed. We therefore ensure that:

- All staff and volunteers are aware of the requirement to, and process of referring allegations against staff
- All staff and volunteers remember that the welfare of the learner is paramount and that they have a duty to inform a DSL if any adult's conduct gives cause for concern
- All concerns of poor practice or possible abuse by staff and volunteers should be reported to the Head.
- All staff are aware of the Whistleblowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

### **Visitors**

Valley College is committed to keeping learners safe by ensuring that visitors do not pose a risk. We therefore ensure that:

- Visitors sign in and wear identification (lanyard) to indicate they have done so
- ALL staff and learners, where appropriate, will challenge visitors who are not wearing correct identification
- Visitors sign out and remove/hand in their identification when they leave
- Visitors are aware of who to speak to if they are worried about a learner during their visit
- Visitors are accompanied during their visit, when learners are present, unless they have undergone relevant checks and these are accepted and verified by a DSL or relevant person.
- Visitors will behave in a way that is compliant with the Conduct Policy
- Visitors will not use mobile phones or other similar electronic devices during their visit unless agreed
- Visitors will not initiate contact or conversations with learners unless this is relevant and appropriate to the reason for their visit
- When there are several visitors at the same time there will be adequate staff supervision of learners and visitors. A risk assessment will be undertaken if deemed necessary or appropriate
- When visitors are undertaking activities with learners, content of the activity will be agreed, prior to the visit

### **Cameras, Phones and Devices**

Valley College is committed to keeping learners safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner and will ensure that:

- Appropriate consent is obtained to take and use photographs and/or videos
- Appropriate consent is obtained for photographs to be taken by the media for use in relation to promoting or publishing Valley College
- Separate appropriate consent is obtained if any other agency requests to take photographs of any learner

- Images will be uploaded to and stored in a secure place for a relevant amount of time.
- Photographs and videos of learners are only taken to provide evidence of their achievements for records or for other college related purposes
- Staff, visitors, volunteers and do not use their own mobile phones to take or record any images of children
- The College's digital camera/s or memory cards must not leave the College setting unless this is agreed by the Head for official business
- Photos are printed/uploaded in the setting by staff and once done images are immediately removed from the camera's memory
- Parents are reminded frequently that they are not permitted to distribute or post images that contain learners other than their own
- Staff, volunteers and visitors will not use mobile phones in toilet or changing areas
- The Code of Conduct and/or Acceptable Use/Behaviour Policy will outline when and where staff, volunteers and visitors can use their mobile phones
- ALL staff, volunteers and visitors will adhere to the above policies and failure to do so will be addressed appropriately
- Learners' use of mobile phones and other devices will be managed under the Acceptable Use/Behaviour Policy/Online safeguarding Policy
- DFE Advice; Searching, Screening and Confiscation is followed where there is a need to search a learner for a mobile device

### **Mental capacity and consent**

People must be assumed to have capacity to make their own decisions and be given all practicable help before they are considered not to be able to make their own decisions. Where an adult is found to lack capacity to make a decision then any action taken, or any decision made for, or on their behalf, must be made in their best interests. Staff have a responsibility to ensure they understand and work in line with the Mental Capacity Act 2005 and in all safeguarding activity, due regard must be given to it. In all cases where a person has been assessed to lack capacity to make a decision, a best interest's decision must be made. Even when a person is assessed as lacking capacity, they must still be encouraged to participate in the safeguarding process.

The Mental Capacity Act outlines five statutory principles that underpin the work with adults who may lack mental capacity:

- A person must be assumed to have capacity unless it is established that they lack capacity
- A person is not to be treated as unable to make a decision unless all practicable steps to help him to do so have been taken without success
- A person is not to be treated as unable to make a decision merely because he makes an unwise decision
- An act done, or decision made, under this Act for or on behalf of a person who lacks capacity must be done, or made, in his/her/their best interests
- Before the act is done, or the decision made, regard must be had to whether the purpose for which it is needed can be as effectively achieved in a way that is less restrictive of the person's rights and freedom of action.

A person lacks capacity in relation to a matter if at the material time he/she is unable to make a decision for him/herself in relation to the matter because of an impairment of, or

disturbance in the functioning of the mind or brain. Further, a person is not able to make a decision if they are unable to:

- Understand the information relevant to the decision; or
- Retain that information long enough for them to make the decision; or
- Use or weigh that information as part of the process of making the decision; or
- Communicate their decision (whether by talking, using sign language or by any other means such as muscle movements, blinking an eye or squeezing a hand)

Mental capacity is time and decision specific. This means that an adult may be able to make some decisions at one point but not at other points in time. Their ability to make a decision may also fluctuate over time. If an adult is subject to coercion or undue influence by another person, this may impair their judgement and could impact on their ability to make decisions about their safety. Thus, an adult could be put under pressure, for example in domestic abuse situations, that they lack the mental capacity to make the decisions about their safety. Staff must satisfy themselves that the adult has the mental ability to make the decision themselves, if not, it is best to err on the side of caution, identify the risks and consider support or services that will mitigate the risk. Preventing the person from isolation can be a protective factor.

### **Valley College ESFA contractual responsibilities**

Valley College will ensure that it notifies the ESFA via the Customer Portal in the event a referral has been made:

- A safeguarding concern related to sexual violence to local authority childrens social care/adult social care and/or the police, or
- An allegation of abuse against a teacher, lecturer, or other member of staff to the designated officer(s) at the local authority.

Valley College will ensure that it notifies the ESFA via the Customer Portal of incidents and/or where a referral has been made, where the college is aware that:

- Is aware of an incident or pattern of incidents which undermines the promotion of British Values or the ability of the college to comply with the Prevent Duty or
- Makes a referral of an individual member with the purpose of determining if that member should be referred to a panel for the carrying out of an assessment under section 36 of the Counter Terrorism and Security Act 2015.

<b>Policy</b>	Policy adopted by the Directors on	September 2019
<b>Key Personnel</b>	Designated Safeguarding Lead (DSL)	Kelly Swindells (Principal) Eileen Melling (Vice Principal) Shazia Ali (Assistant Principal) Sue Johnson (DSL/Academy Business Lead)
	Prevent Lead	Sue Johnson
	Prevent Curriculum lead	Eileen Melling

	Safeguarding and PREVENT Director	Mr G McEwan (Chair of Directors)
<b>Useful Contacts</b>	Lancashire Adult Safeguarding Board	Adult's safety concerns should be reported on 0300 123 6721 or between 8pm - 8am on 0300 123 6722
	Local Authority Designated Officer (LADO)	Tim Booth / Shane Penn / Donna Green - 01772 536694 LADO.admin@lancashire.gov.uk
	Lancashire Social Care	0300 1236720
	Whistleblowing	01772 532500 <a href="mailto:WhistleblowingComplaints@lancashire.gov.uk">WhistleblowingComplaints@lancashire.gov.uk</a>
	Blackburn with Darwen Safeguarding Adults Team	Phone the Customer Liaison Team (for adult social care referrals, social work enquiries) on (01254) 587547, Monday to Friday from 8.45am to 5pm.  Phone the Care Network Hub (formerly 'Your Support, Your Choice' shop) on (01254) 292620 for help and advice on staying independent.  In an emergency, out of these hours phone (01254) 587547/585949  Email: safeguarding.adults@blackburn.gov.uk
	Blackpool Safeguarding Adults Team	Adult social care Monday to Thursday 9.00am to 5.00pm Friday 9.00am to 4.30pm  Telephone: 01253 477800 Emergency out of hours telephone: 01253 477600  You can write to: Adult social care

		Blackpool Council PO Box 4 Blackpool FY1 1NA Email: <a href="mailto:adult.socialcare@blackpool.gov.uk">adult.socialcare@blackpool.gov.uk</a>
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