

# Adult and Community Learning

## Safeguarding Policy and Procedures



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# Safeguarding Policy and Procedures

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## 1 Introduction and definitions

All agencies working with children and adults at risk have a legal duty to work together to protect them from harm or abuse. In Islington the lead in this is taken by the Islington Safeguarding Adults Partnership Board and Islington Safeguarding Children's Board.

The Islington Council website has comprehensive safeguarding policies, procedures, information and advice for children, vulnerable adults, professionals and carers (cf. Appendix 1).

Islington Adult and Community Learning as a provider of learning skills and employment support services is committed to safeguarding and promoting the welfare of children, young people and adults at risk in all of our activities.

This document is the Safeguarding Policy for Children, Young People and Adults at risk. Which will be followed by all staff of the service and promoted by those in positions of leadership and management within the service and by our partners.

Individual agencies are responsible for ensuring that their employees are competent and confident in carrying out their responsibilities for safeguarding and promoting and protecting the welfare of children, young people and adults at risk.

Islington Adult and Community Learning has developed these Guidelines to follow the Council's overarching policy and are aimed specifically at adult learners (including parents and carers and their children), other adult clients, children and providers that we work with.

This policy is based on the following principles:

- The welfare of a child, young person, and adults at risk will always be paramount
- The welfare of families will be promoted
- The rights, wishes and feelings of children, young people and adults at risk and their families will be sought, respected and listened to

Those people in positions of responsibility within the service will at all times work in accordance with the interests of children, young people and adults at risk and follow these policy guidelines.

## Scope of the policy:

- The Director for the service is Andrea Stark, Director of Employment, Skills and Culture
  - The Designated Safeguarding Officer for Adult and Community Learning is David Coleman (020 7527 3343), and Simon Fuller (020 7527 3405) in his absence
- The Designated Safeguarding office for Employment Support iwork is Johnny Naughton (020 7527 5891) and in his absence Hamish Mackay (020 7527 7087)
- The Designated Safeguarding Lead for Young Peoples Services is Darshna Dhokia (020 7527 1317)

### **Children and vulnerable adults**

A child is someone who has not reached his or her 18<sup>th</sup> birthday. IESC will fulfil its statutory duties under the 2004 Children Act to safeguard and promote the welfare of children by ensuring that staff are able to identify children who may be in need of additional services and or early help or who may be suffering or at risk of suffering significant harm and using this policy to ensure that appropriate action is taken to safeguard them. If the person is over 18, they are considered to be an adult.

#### **1.1 Adults – The Care Act 2014**

(<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>)

#### **1.2 'Safeguarding children - the action we take to promote the welfare of children and protect them from harm - is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.' 'Working together to safeguard children' DfE 2018**

'Working together to safeguard children' DfE 2018 defines safeguarding and promoting the welfare of children as:

protecting children from maltreatment

- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

It is not the responsibility of staff to assess, diagnose or investigate whether children are suffering harm. It is the responsibility of all staff to be vigilant and alert to concerns about children and raise those concerns with their Line Managers and or Safeguarding Leads.

### **1.3 Safeguarding indicators for adults and children/young learners.**

The following criteria applies to all children and young adults and adults, in particular vulnerable adults.

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls
- Radicalisation and /or extremist behaviour
- Child Sexual exploitation and trafficking
- The impact of new technologies on sexual behaviour, for example sexting
- Teenage relationship abuse
- Substance misuse
- Issues that may be specific to local area or population, for example gang activity and youth violence
- Domestic violence
- Female genital mutilation
- Breast ironing
- Forced marriage
- Fabricated or induced illness
- Poor parenting, particularly in relation to babies and young children
- Other issues not listed here but that a risk to children, young people and vulnerable adults
- 

### **1.4 Prevent-**

The Prevent strategy, published by the Government in 2011, is part of our overall counter-terrorism strategy: CONTEST. The aim of the *Prevent* strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to “prevent people from being drawn into terrorism”.

‘Safeguarding vulnerable people (children or adults) from radicalisation is no different from safeguarding them from other forms of harm’ Home Office Prevent Strategy

All staff will show due regard to preventing people from being drawn into terrorism. Government guidance is that terrorism is caused by the presence of extremist ideology and a process of radicalisation.

'Radicalisation' is seen as a process through which extremist groups groom vulnerable people into terrorism by indoctrinating them with extremist ideas. 'Extremism' is defined by the government as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs, and/or calling for the death of members of our armed forces whether in this country or overseas.

There are a number of key ways that we are building a strong, educated community that is confident about its diversity and respectful of other faith, beliefs and cultures.

As a service, we use our role as educators to promote these and other universal values for an inclusive and tolerant society. We will monitor the curriculum and our organisation of learning to ensure the promotion of these values, including any single gender activities and our use of outside speakers.

In a classroom situation Prevent is not about preventing learners from having political and religious views. It is rather the opposite: to encourage learners to reflect, debate and where necessary promote critical thinking. IESC aims to create an open environment where learners are able to discuss their views and opinions. Tutors and learners debate and if necessary challenge views that go against the British values expressed above. For example, tutors can encourage learners to think critically and evaluate the accuracy of evidence.

There is no single way of identifying who is likely to be vulnerable. Factors may include

- Isolation including feeling socially excluded
- Out-of-character changes in behaviour
- Lack of self-esteem
- Victim of bullying
- Family Tensions
- Searching for personal identity
- Influence/exploitation from other people in the person's environment or over the internet
- Extrovert behaviour glorifying violence
- Race and hate crime
- Personal grievances
- Political grievances

## **1.5 Multi-Media and the internet**

It is important to know that terrorist groups use social media and the internet to radicalise people. Islington Adult and Community Learning has taken steps to make sure suitable filtering of terrorist and extremist material is in place. Tutors should promote learners' being safe on-line, both while at the centres and outside the classroom. As with other safeguarding risk, you should inform your safeguarding officer if you observe behaviour that concerns you.

We will safeguard children and adults and work with key agencies and services, such as Community Safety Partnerships, to enable learners to calculate, understand and respond to risk appropriately, and support those at risk of being drawn into terrorism.

We will achieve this by:

- training staff to recognise indicators of people being influenced by extremism
- keeping lines of communication open with our learners and their families and community partners
- closely monitoring internet and social media platforms available to staff and our learners that may be used to communicate extremist views
- Countering the myths and untruths of extremist ideology through the curriculum.
- Ensuring a robust reporting system is in place that will enable staff and learners to immediately report any concerns regarding extremism to the Designated Safeguarding Lead
- Regularly meeting with the Prevent Coordinator to ensure the service is up to date with good practice and the councils approach
- Develop a robust risk assessment and action plan to ensure a culture of safeguarding in relation to our Prevent duty obligations

It is a requirement that any employee of the service will promptly respond to a concern about a child or adult who they believe may be vulnerable to being drawn into terrorism by raising their concern with the Designated Safeguarding Lead as a matter of urgency.

### **1.6 Managing a disclosure of abuse from a child or adult**

Any member of staff who receives a disclosure of abuse from a service user (a disclosure is when someone tells you that they are being or have been physically or sexually abused) must manage the disclosure in a way that does not compromise any further investigation. It is important that the person receiving the disclosure does not question or probe for further information. The following list is designed to support staff in managing a disclosure of abuse:

- Listen carefully to what is being said
- **DO NOT** stop the person when they have chosen to talk to you
- Allow the person to tell you what they want to tell you
- **DO NOT** promise that you can keep a secret. If someone begins a conversation by asking you to keep something confidential, explain that it may not be possible to do this if what they tell you means that they are being harmed in some way. Explain that you would have a duty to safeguard them
- **DO NOT** ask questions or probe for more information
- Listen 'actively', you won't say much but your body language and eye contact will let the person know that you are listening to them
- **DO NOT** appear shocked or upset and do not make comments, 'How could she have done that to you?!', 'How awful' etc.
- Acknowledge that it must have been hard for the person to tell you this

- ONLY ask questions to clarify: Explain that, I didn't quite understand
- Mirror back what has been said if you need to clarify
- TELL the person who you are going to tell and why: you will only tell the DSL because they have a duty to support learners and try to keep them safe – no one else will be told
- **DO NOT** give false reassurances – don't say 'Don't worry, everything will be ok' because it might not be as straightforward as that
- TELL the person that you will keep them informed of what will happen next as soon as you know
- TELL the DSL **immediately**, if unavailable report to your line manager. **DO NOT** wait until the end of the day
- RECORD exactly what has been said as quickly as possible and within an hour of the disclosure. Use the person's words and a 'He said, I said' format. Write neatly and legibly in black ink and sign and date the record. Record where the disclosure took place and at what time
- GET SUPPORT for yourself, speak to your line manager

### 1.7 Best Practice

It is best practice to be as open and honest as possible with children, parents/carers and adults about any concerns. However, you MUST NOT discuss your concerns in the following circumstances because doing so could escalate risk to the child or adult at risk:

- where sexual abuse is known or suspected
- where organised or multiple abuse is known or suspected
- where there are concerns a child may be at risk of Female Genital Mutilation
- where fabricated or induced illness is suspected
- where it is judged that discussing the concern with parents/carers or the child would place the child or adult, yourself or others at immediate risk

Staff should always seek the advice of their Line Manager and or Designated Safeguarding Lead if they are in any doubt and should follow the guidance given to them.

### 1.8 Confidentiality and information sharing

Everyone has a right to have their information held confidentially but confidentiality should never override the need to safeguard a child or adult. Any member of staff who is uncertain about whether they should disclose confidential information without the consent of the owner should contact the Designated Safeguarding Lead for advice.

Confidential information should be shared without the consent of the owner when it is judged that it is a 'proportionate response to meet the need to safeguard the individual or others'.

Concerns about confidentiality and data protection should never be a barrier to sharing information in the best interests of service users, be they adults or children.

Information sharing is crucial in meeting the needs of service users and children. It supports professionals in providing an effective response where there are emerging

concerns. It may lead to families or individuals being offered the early help they need or to a child or adult being safeguarded.

Information about service users should be shared appropriately within the service as well as with partner agencies to safeguard and meet the needs of children and adults.

No professional should assume that someone else will pass on information which they think may be critical to the safety and wellbeing of an adult or child.

### **1.9 Recording**

Staff should record concerns about children and adults using the service's recording proforma. It is important to be factual and accurate when recording, using language that is clear and easily understood. It is important to distinguish between fact and opinion. The use of words is important, for example the word 'unkempt' does not give a clear picture of the concern whereas, 'the child smelled of urine and was wearing very dirty clothes' gives precise detail. Recording 'low level' concerns accurately enables staff to track concerns over time. Staff must be aware that a small concern may grow into a much bigger issue and keeping accurate records evidences good safeguarding practice and supports partner agencies in offering services to children and adults.

Records are stored confidentially by DSO and Safeguarding Leads.

### **1.10 Allegations Against Staff**

Any allegation made by a professional, adult or child about a member of staff or volunteer must be passed to the Head of Service Akeel Ahmed who will refer it to the Islington Access Service for advice and guidance or to the Local Authority Designated Officer (LADO) if the member of staff or volunteer works with children.

All staff and volunteers must hold in mind that private life issues may be referred to the LADO or Access Service where appropriate.

### **1.11 Disagreement and challenge**

If a member of staff or volunteer raises a concern about a child or an adult with their Line Manager and feels that it is not being taken seriously or appropriate action is not being taken, the member of staff has a duty to contact their Safeguarding Lead or the Head of Service. Should they believe that the Designated Safeguarding Lead or Head of Service is not responding appropriately, the individual must contact the Access Team or Children's Services Contact Team themselves. Doing nothing is not an option.

### **1.12 Managing concerns about a colleague – ‘Whistle blowing’**

It is not the responsibility of children and adults to raise concerns about the poor practice of professionals. All staff have a duty to safeguard service users by sharing concerns about professional practice and behaviour with senior managers in the knowledge that such concerns will be dealt with in a timely and appropriate way. This is covered in the Islington Council whistleblowing policy.

## **2 Overview**

**Islington Council aims to ensure as far as is possible that anyone, paid or voluntary, who seeks to work in the council and who gains access to children and/or adults at risk is safe to do so.** The Safeguarding Vulnerable Groups Act 2006 (Adult Protection) and the Protection of Freedoms Act (2012) covers:

The recruitment and employment of staff working with children, young people and vulnerable adults, the provision of a safe learning environment

### **2.1 The Recruitment and Employment of Staff Working with Adults at Risk**

The Act sets out a legal framework for the Independent Safeguarding Authority’s (ISA) vetting and barring scheme for the employment of staff and volunteers introduced in 2008. The Disclosure and Barring Service (DBS) was established in 2012 and carries out the functions previously undertaken by the Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA). Islington Council’s HR department is responsible for ensuring that the service follows safer recruitment procedures. This will include carrying out advanced checks (DBS) checks on all staff working with vulnerable learners (and children) every three years.

### **2.2 The Provision of a Safe Learning Environment**

Islington Adult and Community Learning first priority is to ensure the safety and protection of all its learners and clients taking part in learning and other support either through its direct provision or that of its external partners and providers. Learners and clients are encouraged to inform the service (through, for example, the Support Form) if they are vulnerable or at risk but they are not obliged to. Potentially vulnerable learners and clients therefore will not always be easily identified and this policy is aimed at all Islington’s children, young people and adults.

All staff have a duty to safeguard learners and clients, to be alert to signs of abuse and to take action where abuse is reported.

All providers and subcontractors are required to display Safeguarding posters and other relevant information in classrooms and public areas.

Islington Adult and Community Learning is committed to promoting equality, diversity and an inclusive and supportive environment for its learners, staff and others closely associated with its work and affirms the rights of individuals to be treated fairly and with respect.

Learning providers should acknowledge children, young people and adults right to make their own choices and ensure that they are given the information to enable them to make those choices. When a clients choice involves taking an assessed risk, their wishes should be respected within the context of their capacity to anticipate and understand that risk.

Information on Safeguarding is included in both staff and learner inductions which includes information around confidentiality and disclosure.

### 3 Islington Adult and Community Learning Safeguarding Guidelines

To fulfil Islington ACL commitment to safeguard and promote the welfare of children, young people and adults, the service will ensure that it:

- Has in place policies and procedures for safeguarding children, young people and adults and ensures that all staff are aware of these and are adhering to them at all times;
- Gives clear priority for safeguarding and promoting the welfare of children, young people and adults and that this is stated in key documents
- Ensures there is a clear commitment by senior management to the importance of safeguarding and promoting the welfare of children and adults and provides monthly supervision to staff to support best practice
- Have a clear line of accountability and responsibility within our own and our partners' organisations for the safeguarding and promoting the welfare of children, young people and adults
- Will share information with the Islington Adults Safeguarding Board and Islington Safeguarding Children Board when requested to do so
- Have systems in place to monitor outcomes for children and adults
- Work with partner agencies to support service users, signposting to early help, advocacy and services as necessary
- All recruitment and human resource management procedures take account of the need to safeguard and promote the welfare of children, young people and adults, including arrangements for appropriate checks on new staff and volunteers including DBS checks, and where necessary, DBS guidance is followed subsequent to employment
- Be aware of and implement safer working practices and codes of staff conduct
- Have in place procedures for dealing with allegations of abuse against members of staff and volunteers including a named Senior Manager to whom all allegations of abuse can be reported to
- Have in place arrangements to ensure that all staff undertake appropriate training to equip them to deal with their responsibilities and have regular refresher training of a wide range of safeguarding issues including Prevent. Designated Safeguarding Leads will undertake refresher training every two years in line with LSCB requirements. New staff will receive induction training and there will be whole staff training delivered every two years. Safeguarding remains a standing item on staff meeting agendas to ensure that staff knowledge is kept up to date and the duty to

safeguard children and adults remains a priority focus with on-going learning from serious case reviews, adults safeguarding reviews and national learning

- Promote a culture of value and respect for all within a supportive learning environment
- Ensure safeguarding policies and procedures are widely available to all clients, learners, staff and providers and that they are enabled and supported to understand that all staff have a duty of care towards them
- Ensure that there are systems in place to enable staff to record even 'low level' concerns about children and adults in order to build a picture over time
- Work with the Islington Safeguarding Adults Partnership Board and the Islington Children's Safeguarding Board to monitor these Guidelines and keep them up to date
- Ensure policies are in place for e-learning safety
- Provide a designated person at Islington Learning Skills and Employment Service to whom staff and learners can take any complaints or concerns and that the name of the person is publicised and known to all staff and service users
- Ensure that the Head of Service is available in the absence of the designated person (next level up management). The Head of Service is Akeel Ahmed.

### **3.1 Commissioned Partners and Delivery Partners are required to:**

- Have in place policies and procedures for safeguarding children, young people and adults and ensure all staff are aware of these and are adhering to them
- Give clear priority for safeguarding and promoting the welfare of children, young people and adults is stated in key documents
- Agree to a DBS check before employment is confirmed
- Evidence that staff have received appropriate safeguarding training in relation to children and adults at risk
- Are aware of processes for managing allegations against staff
- Show respect for clients, learners and colleagues at all times
- Understand the power and influence of their positions, particularly with more vulnerable learners, and not abuse it, using the code of conduct provided by the employer
- Ensure that all learners are aware of relevant policies and procedures on safeguarding, e-safety, bullying; radicalisation, extremism, sexual abuse, domestic violence, gangs and equality and provide a safe learning environment
- Ensure a diverse curriculum and support offer that is sensitive to difference and diversity
- Invite and encourage constructive feedback from learners about standards and styles of behaviour and promote an open and honest culture
- Deal with complaints of abuse, harassment and bullying promptly, sensitively, confidentially and in accordance with Islington Council procedures
- Ensure that all learners and clients are fully inducted into the service
- Be alert to incidences of private fostering: children left in private fostering arrangements for over 28 days are considered at risk. Staff who pick up any

information of children in private fostering for more than 28 days need to inform the Head of Service (cf. Appendix 2).

### **3.2 Learners and clients are expected to:**

- Promote a supportive and positive learning environment by challenging and reporting behaviour that appears to be causing distress to others.
- Support an open, safe and constructive learning environment in which diversity is valued
- Respect other people's rights to safety
- Not hurt or abuse or threaten to hurt or abuse others.
- Ensure all learners and clients are inducted appropriately and are aware of where and how to report any concerns

### **3.3 Immediate action to ensure safety**

All staff must be aware of their duty to take immediate action to ensure the safety of a child or adult. In the unlikely even that it is not possible to speak to a safeguarding lead, staff must be willing to take emergency action. This might mean that it is necessary to ring Children's Social Care or the Access Service for advice, or contact the Police.

- Call an ambulance if urgent medical help is needed
- Call the police if anyone is at further risk or if an alleged offender may escape arrest

#### **DO NOT**

- Ignore it
- Put yourself or others at risk
- Make judgements or apportion blame
- Ask for more than the basic details
- Promise to keep a secret
- Discuss the situation with anyone other than your line manager/safeguarding lead and/or appropriate authorities
- Confront or question the alleged perpetrator of the abuse

## 4 Contact Details

### **Adults at Risk**

Social Services

Information and Access Team

0207 527 2299

[access.service@islington.gov.uk](mailto:access.service@islington.gov.uk)

For out of hours emergencies call

Emergency Duty Team

(5.00 p.m. – 9.00 a.m. weekdays, 24 hours w/ends and Bank Holidays)

0207 226 0992

### **Childrens Social Care**

Children's Services Contact Team

222 Upper Street

Tel/Fax: 0207 527 7400

Email: [csctreferrals@islington.gov.uk](mailto:csctreferrals@islington.gov.uk)

**Local Authority Designated Officer (LADO)** for allegations against staff in relation to children:

Timur Djavit 0207 527 8101 or Wynand Mcdonald 0207 527 4209 (or by email to [lado@islington.gov.uk](mailto:lado@islington.gov.uk))

### **Out of hours service 5.00pm – 9.00am: 020 7226 0992**

Other contacts:

Police (Islington): 030 0123 1212

Victim Support (London): 0845 303 0900

Samaritans (National): 0845 790 9090

## Appendix 1

### **Web links and further information**

Care Act factsheets

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

Get safe online

<https://www.getsafeonline.org/privacy-policy/>

London Multi Agency Adult Safeguarding Policy and Procedures

<http://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf>

Islington Safeguarding Children Board <http://www.islingtonscb.org.uk/Pages/default.aspx>

London Child Protection Procedures 5<sup>th</sup> edition 2017 (updated September 2019)

[www.londoncp.co.uk](http://www.londoncp.co.uk)

'Working together to safeguard children' DfE July 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Safeguarding Vulnerable Groups Act 2006 - legislation.gov.uk

[http://www.legislation.gov.uk/ukpga/2006/47/pdfs/ukpga\\_20060047\\_en.pdf](http://www.legislation.gov.uk/ukpga/2006/47/pdfs/ukpga_20060047_en.pdf)

Care and support statutory guidance (Adult Care Act 2014)

<https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>

Ofsted safeguarding policy March 2018

<https://www.gov.uk/government/publications/ofsted-safeguarding-policy/ofsted-safeguarding-policy>

## Appendix 2

### ISLINGTON ADULT AND COMMUNITY LEARNING DSL email: [acisafeguarding@islington.gov.uk](mailto:acisafeguarding@islington.gov.uk) SAFEGUARDING REPORTING & RECORDING PROCEDURE

