**Safeguarding Policy**

**Introduction**

INSPIRE MIDDLESEX COLLEGE is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults (this includes apprentices and other learners) and to ensure that the actions are taken to support them if abuse is suspected.

Staff in this organisation recognise and accept their responsibilities to develop awareness of the issues that may cause harm to young people, vulnerable adults, apprentices and other learners and promote the concept of the ‘safe learner’. We are committed to:

* Provide a safe environment for young people and vulnerable adults to learn in.
* Practice safe recruitment in checking the suitability of staff (including agency staff), volunteers and contractors to work with or in an environment where young people and vulnerable adults are present.
* Identify young people and vulnerable adults who are suffering, or likely to suffer, significant harm.
* Take appropriate action to see that such young people and vulnerable adults are kept safe at all times.
* Identify young people and vulnerable adults who are suffering or likely to suffer impairment of their life chances and opportunities to learn and achieve.
* Take appropriate action to ensure that such young people and vulnerable adults have access to all appropriate, available support in order to improve life chances.

This policy is related to and should be read in conjunction with the Inspire Middlesex College Prevent Duty Policy, which we include within our safeguarding responsibilities.

**Purpose of this policy**

The purpose of this policy is to provide advice for staff and associates working with us on helping us to meet our commitment of ensuring that any child, vulnerable adult, apprentice or other learner receiving any form of training, advice or guidance through us is protected from all forms of exploitation and abuse. In particular it covers:

* how we promote the policy
* how we achieve commitment to the policy
* how we train our employees in implementing the policy
* how we ensure protection of and prevent abuse of apprentices and other learners
* our processes for raising, recording and investigating concerns
* our procedures for getting additional support and guidance
* how our IT usage is monitored

We have interpreted and acted on substantial guidance to take preventative measures to protect young people and vulnerable adults from abuse: physical; sexual; psychological/emotional; financial or material; neglect and acts of omission and impairment to their personal and social development.

We believe that our current arrangements reflect the level of risk associated with our 16-19 programme and adult-focused programmes. All staff and associates are asked to subscribe to our Code of Behaviour to help embed the delivery of our policy commitment. We recognise that no guidance can be exhaustive.

Our policy and accompanying procedure is to ensure, so far as is possible, that all who work with us maintain a proper focus on safeguarding and know when to initiate the safeguarding procedure to raise and report concerns.

**Our responsibilities and how we achieve commitment to the policy**

We will:

1. Promote the health and welfare of young people, vulnerable adults, apprentices and other learners by providing opportunities for them to take part in our programmes safely.
2. Respect and promote the rights, wishes and feelings of young people, vulnerable adults, apprentices and other learners.
3. Promote and implement appropriate procedures to safeguard the well-being of young people, vulnerable adults, apprentices and other learners, and protect them from abuse.
4. Support staff and associates to adopt best practice to safeguard and protect young people, vulnerable adults, apprentices and other learners from abuse and to minimise risk to themselves.
5. Continually promote this policy and require that staff and associates adopt and abide by it.
6. Keep a safeguarding register/log to record incidents or concerns and use this to inform our response to future incidents and for risk assessment.
7. Respond to any allegations of misconduct or abuse of young people, vulnerable adults, apprentices or other learners in line with this policy and its accompanying procedure.

**Principles**

The welfare of young people, vulnerable adults, apprentices and other learners is everyone’s responsibility, particularly when it comes to protecting them from abuse. Our programmes provide an excellent opportunity for participants to learn new skills, grow in confidence and maximise their potential.

This policy is based on the following principles:

1. The welfare of young people, vulnerable adults, apprentices and other learners is a primary concern.
2. All young people, vulnerable adults, apprentices and other learners, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from abuse.
3. It is everyone's responsibility to report any concerns about abuse using the procedure prescribed within this policy.
4. Where necessary, we will cooperate with any investigations conducted by Social Services Departments and/or the Police.
5. All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
6. All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.
7. All staff in contact with our learners hold DRB clearance.

**Training**

Every member of staff will receive safeguarding and Prevent training scheduled by the **Designated Safeguarding Lead**. If a member of staff, and in particular those working with apprentices, feels they need additional training, or repeated training, Inspire Middlesex College will support this training need and the member of staff should approach the **Designated Safeguarding Lead** (DSL) in the first instance.

Our recruitment policy includes procedure around safeguarding. As part of their induction programme, every new member of staff will receive safeguarding training covering, Safeguarding, Prevent, Channel, and Equality and Diversity.

**Code of Behaviour - for all staff and associates**

1. Staff and associates must respect a young person’s, vulnerable adult’s, apprentice’s and other learner’s rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviour they do not like.
2. Our staff and associates are expected to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their professional role within the organisation.
3. All staff and associates should be aware of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the **Designated Safeguarding Lead (DSL)**.
4. If a member of staff finds himself or herself the subject of inappropriate affection or attention from a young person, vulnerable adult, apprentice or other learner they should make others aware of this immediately.
5. If a member of staff has any concerns relating to the welfare of a young person/vulnerable adult, be it concerns about actions or behaviour of another staff member or concerns based on any conversation with the young person/vulnerable adult, particularly if an allegation is made, they should report this to the **Designated Safeguarding Lead.**
6. Staff and associates should not start an investigation or question anyone after an allegation or concern has been raised. Staff or associates should just record the facts and report these to the **Designated Safeguarding Lead.**

All allegations of abuse or harm will be treated seriously and consistently. This may lead to an investigation of a possible criminal offence by the police, involvement of an appropriate social care worker or an investigation of our provision and consideration of disciplinary action on staff or learners.

**Monitoring of IT usage**

In line with GDPR guidelines, we may monitor IT usage of apprentices, trainers/assessors and other staff. This is of particular importance regarding our Prevent strategy.

**Confidentiality**

Information will be gathered, recorded and stored in accordance with the Data Protection Policy.

All employees must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults.

Safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the **Designated Safeguarding Lead**

**Our process for raising, recording and investigating concerns**

1. If a member of staff identifies a young person, vulnerable adult, apprentice or other learner at risk of abuse or has any safeguarding concerns, they should assess the nature and extent of that risk and consider if it poses an immediate danger.
2. Report to the Designated Safeguarding Lead, initially this can be a verbal report but it should be followed up with a written report using the same report form that we use for Safeguarding (the Safeguarding Referral Record Form).
3. Seek medical attention for the apprentice, child or vulnerable person if needed.
4. Designated Safeguarding Lead to take any immediate steps to prevent any further danger to the young person, vulnerable adult, apprentice or other learner (in the case of an emergency incident).
5. Make accurate notes to record an incident or conversation. This is important as the DSL may need to refer to them if an investigation is pursued.
6. Complete the Incident Report Form as fully as possible (see Appendix Two).
7. In the case of an apprentice the Designated Safeguarding Lead to liaise with the apprentices’ employer (and/or parent if under 18) where it is safe and appropriate to do so.
8. Upon receiving a report of a safeguarding concern, the Designated Safeguarding Lead reviews, the Incident Report Form and conducts an investigation, if required.
9. Where relevant, develop the most appropriate support plan for the apprentice or member of staff.
10. Designated Safeguarding Lead to take appropriate steps which may include, referral to outside agencies or the apprentices’ employer or other organisations and/or disciplinary action or instigating the Channel process (if a Prevent Duty concern). This is part of our procedure for getting additional support and guidance.
11. Staff and the Designated Safeguarding Lead will cooperate with the authorities who may take the process forward from this point.

**Responsibilities and contact details**

Primary responsibility for safeguarding sits with the Quality Director, Gopal Ladva who is the designated safeguarding lead (DSL).

Inspire Middlesex College: 020 3441 6729

Gopal Ladva, Quality Director: gopal@inspiremiddlesexcollege.co.uk

**Our commitment to reviewing and monitoring our safeguarding practices**

We will work in partnership with local safeguarding partnerships and committees, to include the Safeguarding Children’s Boards and the Safeguarding Adults Boards, to seek guidance on developing our safeguarding practices and dealing with allegations of harm that may have occurred at home or in other situations outside of our remit.

The effectiveness of the safeguarding policy will be monitored by the DSL through data collections and observations undertaken periodically.

We also monitor IT usage. In line with GDPR guidelines we may monitor IT usage of our learners and staff. This is of particular importance with respect to our Prevent strategy.

Concerns recorded in the Safeguarding Register will be reviewed at regular meetings of the senior management team and used to identify risks and put in place actions to mitigate them.

All policies and practices are reviewed annually to ensure that we have we have sound systems in place to minimise abuse of vulnerable adults, young people and to take action where abuse is suspected. It will be evaluated against the latest iteration of the Ofsted criteria in the Education Inspection Framework. We seek to identify which descriptor best matches current safeguarding and Prevent provision at Inspire Middlesex College and then identify actions, where necessary, to reach the next descriptor.

The guidance contained in this policy will be reviewed annually as part of our routine review of quality policies and procedures.

**Appendix One**

**Further information website hyperlinks**

1. www.isa-gov.org.uk
2. Safeguarding Vulnerable Groups Act 2006
3. National Institute of Adult and Continuing Education (NIACE) Safer Practice, Safer Learning

**Definitions of abuse (NIACE)**

**Physical abuse**

This may include: hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. Some of the recognised signs of physical abuse are:

1. Unexplained burns
2. Scratches
3. Bruising and abrasions
4. Drowsiness from misuse of medication
5. Anxiety in the presence of an abuser

**Sexual abuse**

This may include: rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting. Some of the recognised signs of sexual abuse are:

1. Changes in behaviour
2. Bruising
3. Sexually transmitted diseases
4. Sexualised behaviour.

**Psychological/emotional abuse**

There is a strong similarity between both psychological and emotional abuse. Emotional abuse is generally described as an element of psychological abuse. Psychological abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Some of the recognised signs of psychological or emotional abuse are:

1. Fear
2. Passivity
3. Confusion
4. Apathy
5. Lack of eye contact
6. Low self-esteem
7. Disturbed sleep patterns
8. Reluctance to talk openly

**Financial or material abuse**

This may include: theft, fraud, exploitation or the misuse or misappropriation of property, possessions or benefits. Some of the recognised signs of financial or material abuse are:

1. Loss of jewellery and personal property
2. Lack of money to purchase basic items
3. A bill not being paid when money is entrusted to a third party
4. Inadequate clothing
5. Unexplained withdrawal of cash
6. Loss of money from a wallet or purse

**Neglect and acts of omission**

This may include: ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition. Some of the recognised signs of neglect and acts of omission are:

1. Dehydration
2. Infections
3. Malnutrition
4. Hypothermia.

**Discriminatory abuse**

This may include abuse, bullying and harassment based on the individual’s age, sex, disability, religion, race or ethnicity or sexual orientation.

Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse. Although all these forms of abuse are now better analysed and documented not all have been fully recognised by education and training provision in the past. These guidelines recommend that education and training providers should formally recognise all six areas of abuse as identified by the DoH (2000).

**Appendix Two**

**Reporting Form:**

All staff is aware that they must immediately report any concerns they have in relation to any child, vulnerable adult, apprentice or other learner portraying signs of the above definitions of abuse. These reports are to be made via the INSPIRE MIDDLESEX COLLEGE Incident Report Form below.

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| **INSPIRE MIDDLESEX COLLEGE Incident Report Form** |
| **Name of Individual with concern:** |
| **Type of concern:** |
| **Position**: |
| **Learner Name:** |
| **Learner Address:** |
| **Parents/Carers (or for Apprentices the name of their employer) Name and Address:** |
| **Learner Date of Birth:** |
| **Date and Time of any Incident:** |
| **Your Observations:** |
| **Exactly What the Learner Said and What You Said****(Remember, do not lead the Learner – record actual details. Continue on separate sheet if necessary)** |
| **Action Taken so far:** |
| **External Agencies Contacted (Date & Time)** |
| **POLICE: Yes/No (Please Circle)** | **If yes – which:****Name and Contact Number:****Details of Advice Received:** |
| **Local Authorities Children’s Social Care:** **Yes/No (Please Circle)** | **If yes – which:****Name and Contact Number:****Details of Advice Received:** |
| **LOCAL AUTHORITY:****Yes/No** **(Please Circle)** | **If yes – which:****Name and Contact Number:****Details of Advice Received:** |
| **Other (e.g. NSPCC)****-------------------------------------------------------** **-------------------------------------------------------** **-------------------------------------------------------**  | **Which:****Name and Contact Number:****Details of Advice Received:** |
| **Signature:****Print Name in Block Capitals:** |  |
| **Date:** |  |