



ACADEMY
Online Learning Ltd

Safeguarding and Prevent Policy and Procedures

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Introduction

All children, young people and adults at risk, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm or abuse.

In line with mandatory and statutory requirements, AOLL is committed to ensuring that it:

- Identifies young people and vulnerable adults who are suffering, or likely to suffer, significant harm
- Takes appropriate action to ensure that such young people and vulnerable adults are kept safe.

This policy provides guidance to all staff and Service Users to ensure the safety and well-being of all our learners and staff.

This policy has been developed in accordance with the following guidance and legislation:

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2018
- What to do if you are worried a child is being abused 2015
- Protection of Freedoms Act 2012
- Care Act 2014
- Children & Social Work Act 2017
- Keeping Learners Safe 2015
- Safeguarding Children: Working Together Under the Children Act 2004
- Prevent Duty Guidance
- Modern Slavery Act 2015.

A child is defined as someone under the age of 18 years unless he/she has defined special needs.

An adult at risk is aged 18 or over, and:

- Has need for care and support (whether, or not, those needs are being met)
- Is experiencing, or is at risk of, abuse or neglect

As a result of those needs, is unable to protect him or herself against the abuse or neglect or the risk of it.

These procedures for safeguarding children/young people and adults at risk are consistent with Local Safeguarding Children Boards (LSCB) and Local Safeguarding Adults Boards (LSAB).

Our commitment to safeguarding our learners:

- The Senior Leadership Team understands and fulfils its safeguarding responsibilities.
- AOLL has a Designated Safeguarding Lead (DSL), who reports to, and provides strategic guidance to, the Senior Leadership Team. The DSL is responsible for the development, practice and management of Safeguarding within the organisation.
- All existing and new staff will be provided with face to face safeguarding training as part of CPD
- In-house face to face safeguarding training is provided by the DSL (or the Deputy DSL and/or Safeguarding Officers).
- All staff understand their roles and responsibilities relating to ensuring learners' safety and well-being. They know how to respond to someone who discloses abuse and understand the required procedures when dealing with a potential disclosure.
- It is a statutory requirement that all staff read and understand at least Part 1 of 'Keeping Children Safe in Education', 2018. The DSL should ensure that all staff are fully compliant, and that they have a secure understanding of their roles and responsibilities.
- All key stakeholders are made aware of AOLL's safeguarding responsibilities.
- AOLL's selection and recruitment procedure adheres to the principles of safe recruitment outlined in Keeping Children Safe in Education 2018 which also applies to young or vulnerable adults and includes all appropriate checks on employees' suitability through the DBS process, as appropriate.

Responsibilities

AOLL understands that to fulfil its responsibility to safeguard young people and adults at risk, all staff are required to undertake mandatory training and appropriately share any concerns that are identified or disclosed.

- We will immediately refer a person, if there are concerns about his/her welfare, possible abuse or neglect to the appropriate agency where he/she resides. A Safeguarding Reporting Form SRF
- A written record of the referral will be forwarded to the relevant external agencies (where appropriate) within 24 hours of the disclosure.

The DSL will also ensure that:

- Written records about a young person or adult at risk are retained securely on the Safeguarding Referrals Database (SR)
- The DSL will also ensure that:
- Written records about a child/young person or adult at risk are retained securely on the Safeguarding Referrals Database (SRD)
- All such records will be stored confidentially on a secure network. This will be monitored and managed by the DSL
- Ensure that all staff (including sub-contractors/employers) receive regular updates on
- child protection, adults at risk and safeguarding, and that they receive refresher training as required.
- Internal notification procedures for reporting safeguarding referrals to the Senior Leadership Team (SLT) are followed consistently.

Definitions of Abuse

Sexual Abuse

Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they do not want, or have not consented to, cannot understand and lack the mental capacity to be able to give consent to, or have been coerced into because the other person is in a position of trust, power or authority (for example, a care worker).

Physical Abuse

Neglect and acts of omission – Including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise causing physical harm.

Psychological Abuse

Psychological abuse – Including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Sexual Exploitation

Exploitation – Either opportunistically or premeditated, unfairly manipulating someone for profit or personal gain.

Radicalisation & Extremism

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'). Extremism: The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL/white supremacy groups, anti-gay groups, Islamic/Christian ideology. All staff are required to

undertake mandatory e-learning and face to face training; this provides employees with information on how to refer a concern using the Channel process. For further information contact channel.project@gmp.police.uk

Female Genital Mutilation

Female Genital Mutilation (FGM): Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having experienced FGM. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. There is a range of potential indicators that a child or young person may be at risk of FGM. Individually, they may not indicate risk. But, if there are two or more indicators present, this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the police and to the DSL immediately.

Forced marriage

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people. In forced marriage, one or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure.

Domestic abuse or violence

Includes an incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, by someone who is, or has been, an intimate partner or family member regardless of gender or sexual orientation. This includes psychological/emotional, physical, sexual, financial abuse; so-called 'honour' based violence, forced marriage or Female Genital Mutilation.

Modern slavery

Encompasses slavery, human trafficking, forced 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.

Discriminatory

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment; because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

Financial or material

Including theft, fraud, internet scamming, exploitation, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. Organisational (sometimes referred to as institutional) – Adults at risk Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in a person's own home. This may range from one-off incidents to ongoing ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Self-neglect

Includes a person neglecting to care for their personal hygiene; health or surroundings; or an inability to provide essential food; clothing; shelter or medical care necessary to maintain their physical and mental health; emotional well-being and general safety. It includes behaviour such as hoarding.

Reporting Process

The following '5 R' process MUST be followed by all AOLL staff:

Recognise the signs of abuse

Respond and react accordingly

Record the facts of the disclosure

Report the disclosure to the DSL (or Safeguarding team) immediately. All SRFs must be forwarded to the DSL immediately

Refer (to the emergency services or Social Services or through the Channel process) in situations where an individual may be at risk of immediate harm – and ensure that the information is reported to the DSL (or Safeguarding team) immediately. All SRFs must be forwarded to the DSL immediately.

Recognise

Signs of abuse can be recognised as differences to the individual's usual behaviour or observed from a change in their physical appearance as mentioned below:

- Physical – this could include a lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, development of a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.
- Behavioural – this could include sudden changes in a person's character, including lack of confidence, low self-esteem, becoming withdrawn, aggressive or angry for no reason, becoming anxious or tearful.

The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as 'normal'.

Respond

People are often reluctant to talk about abuse. Many perpetrators may tell people to keep the abuse a secret and frighten them with unpleasant consequences. Listed below are some ways to respond to issues or concerns:

- Stay calm and listen carefully to what is being said
- Reassure the person that they have done the right thing by telling you, but not that everything will be okay; sometimes things get worse before they get better
- Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a need-to-know basis.

- Never promise confidentiality

Record

- Allow the person to continue at his/her own pace – asking questions for clarification only; try to ask, 'Tell me', 'Explain to me', 'Describe to me', and avoid leading questions
- Explain what you will do next and with whom the information will be shared

Report

Do not delay in discussing your concerns with the appropriate staff.

If you feel that anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example.

Refer

- Call an ambulance or a GP if someone needs medical attention
- Call the emergency services/police if a crime is taking place or has taken place
- Inform the DSL immediately
- Separate the alleged perpetrator and victim – but only if it is safe to do so.

Any violence by a learner or member of staff (including employer staff) must be reported through AOLL's Internal Notification Process.

If you are suspicious but no disclosure has taken place discuss your concerns with the DSL (or Safeguarding team).

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact your immediate Manager and DSL (or a member of the Safeguarding team)
- Do not question the person making the allegation or investigate the matter yourself.

Information sharing

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality.

When sharing information, remember:

- The Data Protection Act (2018) is not a barrier to sharing information
- Be open and honest
- Seek advice
- Share with informed consent where appropriate (There may be some circumstances where seeking consent, including parental consent, is not required)
- Consider safety and well-being
- Ensure that information sharing is appropriate and secure
- Keep a record.

A Safeguarding Reporting Form (SRF) MUST be completed.

Where an SRF is not readily available, please ensure that the following information is noted:

- Your details
- Name of those involved
- Date of incident(s)/disclosure/suspicion
- Details of incident(s)/disclosure/suspicion
- Background information
- Actions taken.

Whilst you can record observations, do not interpret or give opinions, as this may bias the information provided and jeopardise any future investigation into the allegation.

The SRF should be kept secure and forwarded to your DSL (or Safeguarding team).

Any issues, concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to the DSL (or Safeguarding team).

Important note

For learners aged 18 years or over there is no requirement to report abuse to any external agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case AOLLs safeguarding procedures should be followed. The learner may wish to involve the police. The role of AOLL staff is to support them through this process. Alternatively, if this is past abuse, then the learner may require directing towards a counselling agency, such as NSPCC, Victim Support, Support line or other abuse survivor support agencies

The safety and well-being of the adult at risk is paramount. Staff may have access to confidential information about learners in order to undertake their everyday responsibilities. In some circumstances, staff may be provided with highly sensitive or private information. They should never use confidential or personal information about a learner

or his/her family for their own or others' advantage. Information must never be used to intimidate, humiliate, or embarrass a learner. The DSL (or Safeguarding team) will disclose personal information about a learner to other employees on a need-to-know basis only. The DSL (or Safeguarding team) will make a judgement in each individual case about who needs and has a right to access particular information.

- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children/young people and adults at risk, in consultation with the local DSL (or or Safeguarding team).
- All safeguarding records are subject to the Freedom of Information Act and Data Protection. If there is any doubt as to the rights of any party to access information, AOLL may seek legal advice prior to releasing any information.
- AOLL complies with the requirements of the Data Protection Act 2018. The DPA does not prevent staff from sharing information where this is necessary to protect the safety and well-being of the child or adult at risk.
- All staff must be aware that they cannot promise a child/young person or adult at risk confidentiality, which might compromise the safety or well-being of the learner, or that of another.

Appendix 1

Safeguarding Vulnerable Adults in the Use of Technology and Electronic Media

Information Technology is now an essential resource to support learning and teaching, as well as playing an important role in the everyday lives of children, young people and adults.

Information and Communications Technology covers a wide range of resources, including webbased and distance learning. It is also important to recognise the ever-changing evolution of technology within our society. Currently, the technologies that children and young people are using, both inside and outside of the learning environment include:

- Websites
- Learning platforms and virtual learning environments
- Email and instant messaging
- Chat rooms
- Social Media
- Blogs and Wikis
- Podcasting
- Video broadcasting
- Music downloading
- Gaming
- Mobile/smartphones with text, video and/or web functionality
- Other mobile devices with web functionality.

AOLL undertake the responsibility to educate our learners on e-safety issues to enable them to remain both safe and legal when using the internet. This guidance relates to both fixed and mobile technologies, such as PCs, laptops, tablets, webcams, whiteboards and digital video equipment etc. This policy applies to all staff, learners and visitors. Roles and responsibilities E-safety is an important aspect of strategic leadership, and all staff have a responsibility to ensure that the policy and practices are embedded and monitored effectively by all staff. The IT department and Safeguarding Team will also provide support and guidance to staff, in order to ensure both understanding and awareness, and compliance.

We endeavour to embed e-safety messages across the curriculum, whenever the internet and/or related technologies are used

- All learners and staff will be required to sign a Code of Conduct relating to technologies as part of their induction and their learner agreement.

- All users read and sign a Code of Conduct/Acceptable Use Agreement to demonstrate that they have understood AOLL's Information Technology policies.
- If you think your password may have been compromised or someone else has become
- aware of your password, report this to inhouse technical support.
- Staff are to be aware of their individual responsibilities to protect the security and
- confidentiality of AOLL's networks, including ensuring that passwords are not shared and are changed periodically. Individual staff users must also make sure that workstations are not left unattended and are locked when not in use.
- Staff must ensure that any accounts set up on social media platforms should be kept
- secure and confidential, and that staff profiles are not left logged in.

Data security

The accessing, and potential breaching, of the organisation's databases is a serious offence. Therefore, it is vitally important that all staff are fully aware of their responsibility when accessing the organisation's data. All staff undertake and must pass our GDPR course as part of CPD

They must not:

- Allow third parties' staff to view the organisation's data (unless authorised by a
- senior manager)
- Edit any data (unless specifically authorised to do so by senior managers).

Appendix 3:

Social networking

Social networking sites, if used responsibly both outside and within an educational context, can provide easy-to-use, creative and free facilities. However, it is important to recognise that there are issues regarding the appropriateness of some content, contact, culture and commercialism.

To this end, we encourage our learners to think carefully about the way that information can be added and removed by all users, including themselves, from these sites.

Access to social public networking sites for purposes of learning, engagement and communication is under continual development within the organisation. Any young people engaging in such activities are required to have received specific training in social media usage and safety

- Learners must also sign and adhere to the Code of Conduct during induction
- Learners are advised to be cautious about the information given by others on sites
- Learners are taught to avoid placing images of themselves (or details within images that could give background details) on such sites and to consider the appropriateness of any images they post, due to the difficulty of removing an image once online
- Learners are always reminded to avoid giving out personal details on such sites which may identify them or where they are (full name, address, mobile/home phone numbers, email address)
- Learners are advised that if they have profiles on social networking sites that they set and maintain these on maximum privacy and deny access to unknown individuals
- Learners are encouraged to be wary about publishing specific and detailed private
- thoughts online
- Learners are required to report any incidents of bullying, cyber bullying or sexting
- to members of staff, who will consider action under anti-bullying and safeguarding procedures.

Maintaining professional boundaries

AOLL encourages the positive use of social media. Learners may wish to form effective working relationships with staff; however, to ensure professional boundaries are maintained, staff must not accept and/or invite individuals to be friends on personal social media accounts, or other online services.

Any breach of professional conduct may lead to disciplinary action and possibly lead to dismissal.

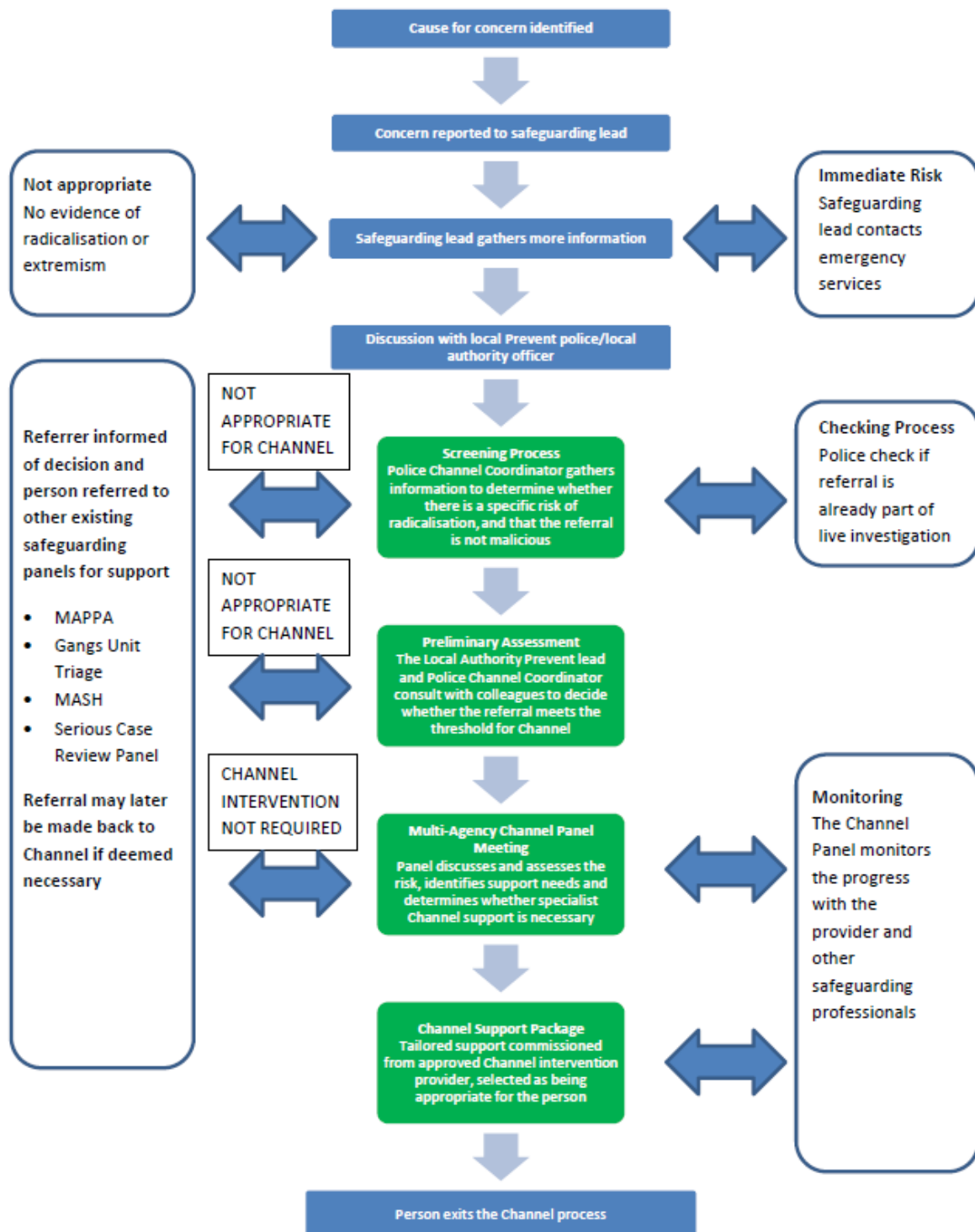
There may be times where a staff member may know a learner on a personal level (in whatever capacity) prior to them commencing on any programme with AOLL. Staff should advise their immediate manager, if this is the case, and an individual assessment of the situation will take place.

Email

The use of email is an essential means of communication for both staff and learners. In the context of using staff emails, this should not be considered private. The Organisation provides all staff with their own email account to use for company business, and this must be used in line with the IT Acceptable Use Policy. Staff should never disclose their email password to learners under any circumstances.

Appendix 4

The Channel Process within FE Colleges



Safeguarding & Prevent Incident Form

Please use this form to record an incident or concern of abuse, neglect or potential vulnerability of any learner on your training programme. This includes any concerns for those learners who are /may be at risk of radicalisation or extremism. It is vital that AOLL maintain records of any incidents and pass them to the required agencies.

Name & full contact details if possible.
Concern or Incident
Date, time & Location
Action Taken
Follow up by AOLL:

Name:

Signature:

Date:

Please retain a copy of this form for your records and pass the original copy to AOLL.



The seven golden rules to sharing information

(Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers)

1. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.