



# **Safeguarding Procedures**

## **Introduction**

This document sets out the detailed procedures that all staff should follow in the event of a safeguarding or child protection concern. It should be read in conjunction with Brent Start's Safeguarding and Protecting Children and Adults at Risk Policy.

## **Safeguarding and child protection**

Safeguarding is the term used for the many different actions Brent Start has taken steps to try to ensure that all our learners are safe from abuse and other actions that may lead them to be unable to function effectively, e.g. harassment, health and safety, or violent extremism.

Abuse happens to people of both sexes, at all ages and in all cultures, religions and social classes, and to people with and without disabilities.

All children and young people under the age of 18 are covered by the Children Acts of 1989 and 2004 and the Education Act of 2002 in relation to child protection. All groups are covered by the Safeguarding Vulnerable Groups Act 2006.

An adult at risk refers to any person over the age of 18 who, amongst other indicators:

- is or may be in need of community care services by reason of mental or other disability, age or illness.
- is or may be unable to take care of himself or herself.
- is or may be unable to protect himself or herself against significant harm\* or serious exploitation.

\* Significant harm covers the four categories of harm (i.e. physical, sexual, emotional and neglect), but also includes serious financial or material exploitation (see page 6).

An adult at risk is defined by the Care Act 2014 as: any individual who has need for care and support and is experiencing, or at risk of, abuse and neglect and is unable to protect themselves from either that risk or the experience of abuse and neglect.

## **Legal duties of all staff**

It is important that all young people and adults are protected from "significant harm". All complaints, allegations or suspicions must be taken seriously and acted upon promptly.

All practitioners who work with children and adults have a duty under law to report any concerns they may have about a child or adult.

The procedures set out below must be followed whenever an allegation is made that a child, young person or adult has been abused or when there is reasonable cause to believe that abuse has taken place.

The Safeguarding and Protecting Children and Adults at Risk Policy includes all young people under 18 and adults. It can be found on the Brent Start Intranet. Learners who are potentially vulnerable because of learning difficulties and/or disabilities, regardless of age, are also covered by this policy.

## **Recognising abuse**

Indications that a young person or adult is at risk and may be experiencing abuse include the following:

1. They appear frightened of parent/s/peers/adults.
2. They may display unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
3. They may have an injury for which the explanation seems inconsistent.
4. They may demonstrate inexplicable changes in behaviour.
5. They may demonstrate inappropriate sexual awareness.
6. They may engage in sexually explicit behaviour.
7. They may display an unusual distrust of adults, particularly those with whom a close relationship would normally be expected.
8. They may experience difficulty in making friends.
9. They may be prevented from socialising with other adults/young people.
10. They may display variations in eating patterns including overeating or loss of appetite.
11. They may experience inexplicable weight loss.
12. They may appear increasingly dirty or unkempt.

## **Think outside the box**

- If a learner is found asleep in a lesson, could they need support with housing?
- If their body odour is so bad that you need to talk to them about showering, could they be living rough?
- Has behaviour been dismissed as “normal” because they are from a different culture?
- Consider whether the normal behaviour of the person has changed, for example have they suddenly become withdrawn or aggressive? Is their behaviour unusual for their age and maturity?
- Have their friends told you they have a problem but they can't tell anyone?
- Do they tell you a story about a “someone they know” and ask your advice?

Abuse is not acceptable no matter what the background, culture, faith or belief.

## **Remember:**

- The indicators listed could be signs of OTHER concerns.
- ALWAYS discuss your concerns with a Safeguarding Officer. This is in confidence.
- Keep a confidential record of your concerns noting dates and incidents.

## **Responding to abuse**

If anyone informs you that he/she has been a victim of abuse:

- Stay calm and try not to show shock or disbelief.
- Listen very carefully.
- Be sympathetic.
- Tell the person that they did the right thing in telling you and that you are treating the information seriously.
- Don't promise to keep secrets, explain that you must tell the Lead Safeguarding Officer who may need to contact the Local Authority Adult Safeguarding Helpdesk.
- Do not be judgmental (for example, "Why didn't you run away?")
- Refrain from starting to investigate by doing any of the following:
  - Asking leading questions such as "Did this make you feel... or, Did ... happen, Were they doing..." When cross examined in court this type of questioning can invalidate the evidence.
  - Pressing the person concerned for more details about the abuse. Too much pressure may result in them not wanting to tell you
  - Contacting the alleged abuser yourself.
- Always listen to what you are being told, particularly to what is being said spontaneously. Do not assume.

Remember that any records you keep should be made confidential and sent to a Safeguarding Officer to be kept in a safe place. You should not keep multiple copies.

## **Responding to an allegation**

Any suspicion, allegation or incident of "significant harm" (see below for examples) must be reported to a Safeguarding Officer and on the same day. Do not rely on just email or voice messaging to report a concern.

A Safeguarding Disclosure Form is normally completed as a follow up to the concern and as a record. This can be found on the Brent Start Intranet at N:\Brent Start\Brent Start Safeguarding.

This procedure should be followed whenever there are reasonable grounds to suspect that a young person or adult “is or is likely to be suffering significant harm”. (see page 6).

Promises of confidentiality should not be given as matters may develop meaning that promise may not be honoured.

Take the person seriously and listen without asking leading questions allowing a free recall and impromptu account in a non-judgmental way.

If the complainant is the person him/herself, questions should be kept to the minimum necessary to understand what is being alleged, and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

Report the details to a Safeguarding Officer on the Safeguarding Disclosure Form (Appendix D).

A full record should be made as soon as possible of the nature of the allegation or suspicion, and any other relevant information including:

- Date and time
- Place where and circumstances in which the allegation took place
- Name of complainant
- Name of student subject to allegation or suspicion if different from complainant
- The nature of the abuse and a description of any injuries observed
- A written account of the allegation
- Family/household composition if known

### **Allegations Concerning Members of Staff**

Any suspicion, allegation or actual abuse of a student by a member of staff must be reported to the Lead Safeguarding Officer (LSO) as soon as possible. If within that working day it has not been possible to contact the LSO, the matter must be reported to a safeguarding Officer, an alternative senior manager or the relevant Programme Leader on that day. Staff are required to report all cases of suspected violation of the Sexual Offences (Amendment) Act 2000.

If the LSO is the subject of the allegation or complaint, the matter must be reported to the Brent Start Senior Manager. In the event of a complaint being made against the Brent Start Senior Manager, the LSO will notify the Safeguarding Team at Brent Council.

## **Confidentiality and Responsibility**

At all times confidentiality will be paramount in the child and adult protection procedure with only essential personnel being notified.

Parents or carers may need to be involved, but staff should leave the responsibility of informing parents/carers to the member of the Safeguarding Team.

## **Confidentiality and note taking and record keeping**

The need to work in partnership with other agencies and individuals needs to be offset by the need to maintain the rights of privacy. Information should therefore be sought and shared only on a need to know basis, both within and external to Brent Start.

## Bullying

If you are at all concerned speak to a Safeguarding Officer. Any case of serious bullying will be recorded.

### The Safeguarding Team

<b>Responsibility</b>	<b>Name</b>	<b>Job Title</b>
Lead Safeguarding Officer	Trevor Baxter	Learner Services Manager
Safeguarding Curriculum and Adults with Learning Difficulties	Francesca Ntiamoah	Adults with Learning Difficulties (ALD) and Additional Learning Support (ALS) Programme Leader

**If you have serious concerns as to the welfare of a young person or adult who you feel is at risk of abuse or violent extremism and which requires IMMEDIATE attention, please contact:**

**Young person: Brent Local Safeguarding Children Board (LSCB): 0208 937 4300**

**Adult: Adult Safeguarding Team: 0208 937 4098/4099**

**And contact Trevor Baxter (Learner Services Manager): 07776666530**

**If you have serious concerns that an individual may be at immediate risk of criminal assault or harm, you should contact the Police and then inform the Trevor Baxter (Learner Services Manager): 07776666530.**

### Brent Council Links:

**Adult Safeguarding Team: [SafeguardingAdults@brent.gov.uk](mailto:SafeguardingAdults@brent.gov.uk) 0208 937 4098/4099**

**Brent Local Safeguarding Children Board (LSCB): [Family.Frontdoor@brent.gcsx.gov.uk](mailto:Family.Frontdoor@brent.gcsx.gov.uk) 0208 937 4300**

### Prevent Programme and Projects Officer:

Mohinder Singh Perihar (mohinder.perihar@brent.gov.uk)

## **Appendix A: Types of Abuse**

Abuse can take many forms, and incidents of abuse may be one-off or multiple, and affect

one person or more. Abuse may also be very subtle. This list is not exhaustive; staff need to be alert and take the initiative to spot these forms of abuse as well as other forms that might occur.

### **1. Physical Harm**

Action will be taken under this heading if staff have reasonable cause to believe that there has been a physical injury to a child, young person or adult, including deliberate poisoning or Female Genital Mutilation (FGM) or where there is definite knowledge, or a reasonable suspicion, that the injury was inflicted or knowingly not prevented.

### **2. Sexual Harm**

Action will be taken under this heading if staff have witnessed occasions where a child, young person or adult at risk indicates excessive pre-occupation with sexual matters, or has an inappropriate knowledge of adult sexual behaviour, given the age and circumstances of the person concerned.

### **3. Emotional Harm**

Action will be taken under this heading if staff have reason to believe that there is a severe adverse effect on the behaviour and emotional development of the child, young person or adult caused by persistent or severe ill treatment or rejection.

### **4. Neglect**

Action will be taken under this heading if staff have reason to believe that there has been persistent or severe neglect of a child, young person or adult (e.g. by exposure to any kind of danger, including cold and starvation) which results in serious impairment of that person's health or development. This includes Self Neglect where there is evidence to raise concerns that an individual is neglecting to care for their personal hygiene, health or surroundings and includes behaviour such as hoarding.

### **5. Discriminatory Harm**

Staff need to be aware of discrimination towards people, especially vulnerable or intimidated persons, and its implications. Examples include:

- Racist remarks or racist attack on the person
- Sexist remarks or offensive behaviour
- Disability remarks or offence of any kind
- Harassment of any kind, including slurs or similar treatment.





## **6. Modern slavery:**

Action will be taken under this heading if staff have reason to believe that the person is the victim of coercion and/or inhumane treatment due to being forced into a life of servitude. This encompasses slavery, human trafficking, forced labour and domestic servitude.

## **9. Organisational abuse:**

This includes evidence to suggest that an individual is subject to poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in their own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

## **11. Use of Social Media in an abusive way:**

The type of abuse that can occur through social media can include emotional, psychological, sexual and/or financial abuse. Social media includes (but is not limited to): networking sites such as Facebook, Twitter and LinkedIn, email, text messages, Skype and instant messaging services. Staff should be alert to any evidence where a learner demonstrates fear or apprehension relating to the use of social media.

## **12. Forced Marriage**

Possible indicators of forced marriage:

- Unexplained absence
- Decline in performance or punctuality
- Low motivation
- Not allowed to attend extracurricular activities.

## **13. Violent Extremism**

See Appendix B

## **Appendix B: Prevention of Violent Extremism – The ‘Prevent’ Agenda**

Section 21 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies, listed in Schedule 3 to the Act, to have “*due regard to the need to prevent people from being drawn into terrorism*”. The Act states that the authorities (including education institutions) subject to the provisions must have regard to this guidance when carrying out the duty.

While the legislation was prompted following examples of Al Qaida behaviour, it is also aimed at reducing the risk of radicalisation of vulnerable people by other groups, including some Animal Rights Groups and Far Right Groups. Young people and vulnerable groups are particularly targeted by groups who may promote violent extremist activity.

Brent Start staff should be aware of signs of radicalisation and have the confidence to report their concerns to the Lead Safeguarding Officer (the Quality Manager) or, in their absence, any member of the Safeguarding Team or Senior Management Team.

Staff should promote the ethos of the Prevent Agenda by encouraging free and open debate but challenging extreme views. They should encourage, by finding naturally occurring opportunities in lessons and induction activities, a belief in Equality of Opportunity, the celebration of Diversity and the promotion of British values.

A member of staff should not host or allow the premises to be used by extreme groups and should seek to prevent the distribution of extreme literature.

Brent Start has a legal responsibility to forbid the promotion of partisan political views in the teaching of any subject and staff should take such steps as are reasonably practicable to secure that where political issues are brought to the attention of students they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of Brent Start and could constitute misconduct.

If a member of staff feels that any student is in danger of radicalisation, they should report this to the Lead Safeguarding Officer who will make the decision whether to involve the police or other external agencies.

Brent Start uses filtering as a means of restricting access to harmful internet content. This ensures that websites promoting extremist views and encouraging the radicalisation of young people are automatically blocked. In addition to this, the IT network team monitor activity on the network. As some students and staff may be using IT in the course of their learning, and this may involve research relating to terrorism and counter-terrorism, Brent Start has clear policies in place to identify and address instances where online materials are accessed for curriculum purposes. All staff should be aware of the Brent Start Policy on eSafety.

## Appendix C: Female Genital Mutilation (FGM)

The World Health Organisation states that FGM comprises all procedures involving *'the partial or complete removal of the external female genitalia or other injury to the female genital organs whether for cultural or any other non-therapeutic reason'*.

FGM is recognised internationally as a violation of the human rights of girls and women. It reflects inherent inequality between sexes, and constitutes an extreme form of discrimination against women. FGM has no health benefits to girls or women. Procedures are mostly carried out on young girls sometime between infancy and age 15, and occasionally on adult women. In Africa, more than three million girls have been estimated to be at risk of FGM annually.

The Female Genital Mutilation Act was introduced in 2003 and came into effect in March

2004. The Act makes it:

- Illegal to practise FGM in the UK.
- Illegal to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in that country.
- Makes it illegal to aid, abet, counsel or procure the carrying out of FGM abroad.
- Instils a penalty of up to 14 years in prison and/or a fine.

The practice is most common in the western, eastern, and north-eastern regions of Africa, in some countries in Asia and the Middle East, and among migrants in the UK. The largest population groups from practising countries are from Ghana, Kenya, Nigeria, Somalia and Uganda. Brent has a significant population with origins from these countries.

Professionals, including social workers and teachers, in England and Wales have a duty to report discovering that FGM appears to have been committed on a girl under 18.

The discovery will have to be made in the course of work and arise when a girl reports FGM and has no reason to believe it is necessary for physical or mental health. Such a notification will not breach the confidence of the child.

This new duty to report is introduced by a section inserted into the FGM Act by the Serious Crime Act 2015.

## Appendix D: Safeguarding Disclosure Record

<b>Name:</b>	<b>Class:</b>
<b>Outline of concern / report of incident:</b>	
<b>Date:</b>	
<b>Signature:</b>	

## Appendix E: Code of Practice

The following code of practice applies to all Service staff and students working with children, young people, or vulnerable adults, whether acting in a paid or unpaid capacity:

- Avoid unnecessary physical contact.
- Avoid taking a child, young person, or vulnerable adult alone in a vehicle on journeys, however short.
- Unless circumstances make it impossible to comply, do not take a child or vulnerable adult to the toilet unless either (a) another adult is present or (b) another adult is aware (this may include a parent or group leader).
- If you find you are in a situation where you are alone with a child, young person or vulnerable adult, wherever practicable make sure that others can clearly observe you.
- Avoid close personal relationships with a child, young person or vulnerable adult in relation to whom you are in a position of trust.
- Do not make suggestive or inappropriate remarks to or about a child, young person or vulnerable adult, even in fun, as this could be misinterpreted.
- If a child, young person or vulnerable adult accuses a student or member of staff of abuse or inappropriate behaviour, you should report this immediately to the relevant person.
- The duty to report applies equally to complaints or accusations of historic, and not just recent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusation from a child, young person or vulnerable adult, it is important to listen without making or implying any judgement as to the truth of the complaint or accusation.
- If a child, young person or vulnerable adult makes a complaint, or if there are other reasons for suspecting abuse, you should not attempt to investigate this yourself, but should report your concerns to the designated individual appointed under the Service's policy ("the policy") on the safeguarding of children, young people and vulnerable adults.
- Participate in the training available to you to support you in your work with children, young people, and vulnerable adults.
- Remember that those who abuse children, young people and vulnerable adults can be of any age (even other children and vulnerable adults), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.
- Good practice includes valuing and respecting children, young people and vulnerable adults as individuals, and the adult modelling of appropriate conduct – which would exclude bullying, aggressive behaviour and discrimination in any form.
- Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in the policy. Any information received should be acted upon sensitively, effectively, and efficiently. Wherever possible, those making allegations should be given information about the outcome.
- Although allegations should be reported only on a "need to know" basis, staff and students making allegations need not be concerned that they will be

breaching confidentiality or the Data Protection Act, as complying with the policy overrides such obligations. If the person making the allegation feels they need counselling or other appropriate support from the Service, they are encouraged to seek it.

- Ensure that you comply with appropriate licensing laws.