



# **SAFEGUARDING POLICY AND PROCEDURES 2023-24**

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SAFEGUARDING POLICY AND PROCEDURES		
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Summary/Description:		
<p>This document sets out the responsibilities of the College regarding the safeguarding of children and adults associated with the course of its activities, from the risk of harm, neglect or radicalisation and outlines the College's policy and procedures in relation to such matters, and any common reporting and escalation process for concerns about a member of the College community.</p>		
<p><i>This document has been adapted from the Model Safeguarding policy and procedures (Baptist Union of Great Britain) with some material also taken from the University Sheffield with grateful thanks. This document has been revised in response to feedback received from the Office for Students and the Open University.</i></p>		
<p><b>2023-24 v1</b></p> <p>Reviewed June 23 (updated personnel, changes in terminology and weblinks and all references to disclosure amended to reflect use of My Concern software)</p> <p>July 23 added third bullet point to 2.11 added hyperlinks throughout the document and amended ThankQ to Donorfy at 4.27</p>		

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# 1. DEFINITIONS OF TERMS

**Child:** For the purposes of this policy, the term 'child' refers to anyone under the age of 18 years.

**Adult at risk:** There is no standard single definition for an adult at risk, so for our policy we are using the following simple definition taken from Thirtyone:eight (Independent Christian Safeguarding charity):

*'Any adult aged 18 or over who due to disability, mental function, age, illness or traumatic circumstances may not be able to take care or protect themselves against the risk of significant harm, abuse, bullying, harassment, mistreatment or exploitation.'*

Some adults might be more at risk than others, and there are some times in life where risks may increase. Some of these circumstances may include:

- Learning, sensory or physical disability or difficulty
- Old age and frailty (especially if it creates a dependency on or needing help from others)
- Mental health problems
- Dementia or confusion
- Illness
- Addiction or dependence on alcohol, drugs or medication
- Bereavement
- Past abuse or trauma
- English is not their first language'

**Safeguarding and promoting the welfare of children:** For the purposes of this policy, the definition from Keeping Children Safe in Education (2023) is used:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

**Safeguarding adults at risk:** For the purposes of this policy, the definition is taken from the Care Act (2014):

- Protecting an adult's right to live in safety, free from abuse and neglect;
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect;
- Making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

**The Prevent duty:** For the purpose of this policy, the definition is taken from the Counter-Terrorism and Security Act (2015):

The duty on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

**Terrorism:** For the purposes of this policy, the definition of terrorism is taken from the Terrorism Act 2000:

'the use or threat of action which involves serious damage to property; or endangers a person's life; or creates a serious risk to the health and safety of the public or a section of the public; or is designed to seriously interfere with or disrupt an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.'

**Extremism:** For the purposes of this policy, the definition of extremism is taken from the statutory Prevent Duty Strategy (2011):

'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 calls for the death of members of our armed forces, whether in this country or overseas.'

**Worker:** For the purposes of this policy, the term 'worker' includes any person over the age of 18 who works in any capacity (either paid or voluntary) for or on behalf of the College.

## **2. SAFEGUARDING POLICY STATEMENT**

### **2.1 Our vision**

The purpose of All Nations Christian College is “to train and equip men and women for effective participation in God’s mission to His multicultural world.”

In fulfilling this vision, we:

- Welcome individual students and students with families from all nations (which can include children and adults at risk) into the life of our community
- Provide academic learning and training for adult students
- Provide on-site accommodation for students and their dependents
- Make our premises available to individuals and external organisations to hire for conferences

### **2.2 Our safeguarding responsibilities**

The College recognises its responsibilities in safeguarding all children and adults at risk, regardless of gender, sexuality, ethnicity or ability.

As members of this College we commit ourselves to the nurturing, protection and safekeeping of all associated with the College and will pray for them regularly. In pursuit of this, we commit ourselves to this policy and to the development of sound procedures to ensure we implement our policy well.

### **2.3 Scope**

The policy applies to all those who live on or visit the College site. This includes:

- Workers
- Students (and their families)
- Conference users, hirers and other charity workers whose organisations rent College premises
- Visitors to the College

### **2.4 Legislative framework & guidance**

This policy has been developed in accordance with the following legislation and guidance. This list is not exhaustive.

- Care Act 2014
- Children Act 1989 and 2004
- Counter Terrorism and Security Act 2015
- Data Protection Act 2018
- Education Act 2002
- Equality Act 2010
- Health and Safety at Work etc Act 1974
- Hertfordshire Safeguarding Children Partnership Procedures 2022
- Keeping Children Safe in Education 2023
- Model Safeguarding policy and procedures (The Baptist Union of Great Britain)
- Protection of Freedoms Act 2012
- Safe to Belong – safeguarding adults at risk policy (The Baptist Union of Great Britain)
- Safeguarding Vulnerable Groups Act 2006
- Terrorism Act 2000
- Working Together to Safeguard Children 2018



## **2.5 Policy**

### **2.5.1 *Prevention and reporting of abuse and terror related activity***

It is the duty of each College member to help prevent the abuse of children and adults at risk, and the duty of each College member to respond to concerns about the well-being of children and adults at risk. As such, any abuse disclosed, discovered or suspected (including concerns that a person is being drawn into terrorism) and any allegations against workers that they may have harmed a child or adult at risk will be reported in accordance with our procedures.

The College will fully co-operate with any statutory investigation into any suspected abuse linked with the College.

The College will seek to meet its obligations under the Prevent Duty to ensure that vulnerable individuals are safeguarded from being drawn into terrorism on our premises.

The College will also comply with its statutory duty to report to the police any suspicion that a person has committed a terrorist offence or any information which might be of material assistance in preventing the commission or an act of terrorism or apprehending an offender.

### **2.5.2 *Safer recruitment, training, support and supervision of workers***

The College will exercise proper care in the selection and appointment of those working with children and adults at risk, whether paid or voluntary. All workers will be provided with appropriate training, support and supervision to promote the safeguarding of children and adults at risk.

### **2.5.3 *Respecting children and adults at risk***

The College will adopt a code of behaviour for all who are appointed to work with children and adults at risk so that all children and adults are shown the respect that is due to them.

### **2.5.4 *Safer working practices***

The College is committed to providing an environment that is as safe as possible for children and adults at risk and will adopt ways of working with them that promote their safety and well-being.

### **2.5.5 *A safer community***

The College is committed to ensuring a safe and secure environment for all those who live, work and study at the College (including students who are temporarily away from the College whilst undertaking ministry placements or internships in the UK or overseas) or who hire our premises.

The College takes a risk-based approach to put measures in place which seek to ensure that the behaviour of any individuals who may pose a risk to children and adults at risk in the community of the College is managed appropriately.

Health & Safety, Safeguarding and Prevent are standing items on the Senior Leadership Team's agendas for meetings. The responsible person for Health and Safety and the Designated Safeguarding Lead / Prevent Lead will report any activity since the last meeting and the team will discuss what action may be needed to mitigate a similar risk reoccurring.

Health & Safety, Safeguarding and Prevent also appear on the regular operational report from the Senior Leadership Team to the Board of Trustees and use this information to monitor and review the effectiveness of the College's associated procedures.

### **2.5.6 *Partnerships***

The College shall maintain its partnerships with Herts Safeguarding Children Partnership, Herts Safeguarding Adults Board, Herts Prevent Team, OfS Prevent team and our DfE Further and Higher Education Regional Prevent Coordinator.

## **2.6 Safeguarding responsibilities and contact points within our College**

### **2.6.1 Safeguarding Team**

The ultimate responsibility for safeguarding and Prevent lies with the Board of Trustees. Whilst maintaining its responsibilities for strategic oversight of safeguarding and Prevent, the Board has appointed the following individuals to form the College Safeguarding and Prevent team which deals with all concerns related to safeguarding and Prevent:

#### **STEVE TOMPKINS - Designated Safeguarding Lead (DSL) and Prevent Lead**

He will be the lead person with responsibility for raising the profile of safeguarding in the College and will advise the College on any matters related to the safeguarding of children and adults at risk taking the appropriate action when abuse is disclosed, discovered or suspected. He will also advise the College on matters related to Prevent, review the College's risk Prevent risk assessment with regard to information from the Counter Terrorism Local Profile, liaise with local Prevent partners and take appropriate action when Prevent concerns are raised.

Phone number: 01920 443518

Email address: s.tompkins@allnations.ac.uk

#### **JAN BARLOW, Deputy Designated Safeguarding Lead (DDSL) and Pastoral Tutor**

She will assist the Designated Safeguarding Lead (DSL)/Prevent Lead in helping the College on any matters relating to Prevent and to the safeguarding of children and adults at risk and take the appropriate action when abuse is disclosed, discovered or suspected or when Prevent concerns are raised.

Phone number: 01920 443523

Email address: j.barlow@allnations.ac.uk

#### **VACANT, Deputy Prevent Lead**

S/He will assist the Prevent Lead in helping the College on any matters related to Prevent and to the safeguarding of children and adults at risk and take the appropriate action when abuse is disclosed, discovered or suspected or when Prevent concerns are raised.

Phone number: 01920 443500

Email address: @allnations.ac.uk

#### **PETE HERBERT-JAMES, Safeguarding Trustee**

Through working closely with the Designated Safeguarding Lead, he will monitor the College's compliance with safeguarding legislation and lead the Board of trustees in reviewing the effectiveness in which the College's safeguarding policy and procedures are implemented.

Phone number: 01920 443524

Wherever possible, the College Safeguarding and Prevent Teams will work together if and when issues arise. However, every member of the College has a responsibility to report allegations of abuse as soon as they are raised.

### **2.6.2 Safeguarding Responsibilities**

Those in positions of authority, such as the Members of the Board of Trustees, the Principal/CEO, the Senior Leadership Team and the Prevent Duty Lead/Designated Safeguarding Lead, have formal responsibilities under this policy and are expected to familiarise themselves with this policy on appointment. The overall responsibility for achieving the objectives of this policy and ensuring its compliance rests with the Board of Trustees, who are also responsible for its annual review and monitoring.

### ***i. Board of Trustees***

- Overall responsibility to ensure that the College Safeguarding policy and procedures and safeguarding training are effective and comply with the law
- Ensure that an annual review of the College Safeguarding policy and procedures and their effectiveness is undertaken and considered by the Board
- Ensure that there is a named Designated Safeguarding Lead and a nominated trustee to oversee safeguarding
- Through the annual review, ensure that the College contributes to inter-agency working
- Through the annual review, ensure that all staff, students and volunteers undertake regular safeguarding and Prevent training
- Through the annual review, ensure safer recruitment processes for all appointments

### ***ii. Principal / CEO***

- Work in accordance with the safeguarding requirements upon all members of the College community
- Ensure that the Safeguarding Policy and procedures (including those for Prevent) adopted by the Board of Trustees are followed by the College
- Oversee any complaints or allegations brought under the terms of the Safeguarding Policy and make sure that decision-making complies with all relevant policies and regulatory bodies
- Ensure that the Senior Leadership undertakes an annual review of this policy and agrees any amendments

### ***iii. Designated Safeguarding Lead / Prevent Lead***

- Take lead responsibility for maintaining an overview of safeguarding (including Prevent) in the College, including the review of this policy and associated procedures and monitoring their implementation
- Open channels of communication, including with local statutory agencies
- Manage child protection and adult safeguarding and Prevent concerns and referrals
- Undertake required safeguarding and Prevent training to ensure knowledge is up to date and ensure all staff and students partake in regular safeguarding and Prevent training
- Raise awareness of the safeguarding policy and procedures in College and ensure that everyone in College (including students, temporary staff, volunteers, contractors, visitors, hirers and conference guests) is aware of these procedures and that they are followed at all times
- Act as a source of advice and support for other staff (on safeguarding and Prevent matters) and ensure that timely referrals to Children's Services, Adult Social Care or Adult Mental Health services are made in accordance with current Hertfordshire Safeguarding Children Board and Hertfordshire Safeguarding Adults Partnership procedures
- Work with the local authority and other agencies as required and monitor the effectiveness of the policies and procedures in practice.
- Provide an annual report for the Board of Trustees detailing any changes to the safeguarding and child protection policy and procedures; training undertaken by all staff (including students and volunteers) and trustees and other relevant issues. (This report forms part of the trustees' annual review of the effectiveness of the College's safeguarding procedures and their implementation).

### ***iv. All staff / students / volunteers / visitors / hirers***

- Be familiar with this policy and the associated procedures and comply with them at all times
- Contribute to maintaining a safe living, learning and working environment
- Treat everyone with dignity and respect at all times

- Identify children and adults who may benefit from help/support
- Raise concerns with the Principal/CEO, if they arise, about the attitude or actions of members of the College community in relation to the Code of Conduct
- Inform the DSL/Prevent Lead of all safeguarding concerns without delay
- Follow all College policies and procedures relating to safeguarding
- Refer children/adults to social care and/or the police if there is a need to do so

## **2.7 Confidentiality**

All information relating to safeguarding concerns will be managed in a confidential and sensitive way. However, this must not prevent or delay relevant information about abuse or concerns being shared with the Safeguarding team and statutory authorities when following the College Safeguarding procedures in order to safeguard a child or adult at risk of harm.

The College will follow the information sharing protocols as stipulated by statutory authorities.

## **2.8 Pastoral Support**

The College is committed to providing pastoral care and support for any person who has experienced abuse of any kind.

## **2.9 Equality and Data Protection**

Safeguarding concerns will be considered impartially and in accordance with the College [Equality and Diversity Policy](#)'. All records are kept in accordance with the College [Data Protection Policy](#), which outlines data subjects' rights regarding the processing of that data.

## **2.10 Complaints and Appeals**

Should anyone wish to complain about the handling of a safeguarding investigation in which they were involved, they should follow the College [Complaints Policy](#).

## **2.11 Policy Approval, Review and Communication**

- A copy of this safeguarding policy statement will be displayed permanently in the College Reception area and is also available on our College website [www.allnations.ac.uk](http://www.allnations.ac.uk), in the student area of the College VLE and in the Staff Handbook and Additional Staff Policies & Procedures documents which are in the Staff folder on the P Drive and are obtainable from the College Administrator.
- Each worker with children and/or adults at risk (including those hiring the College facilities) will be given a full copy of the Safeguarding Policy and Procedures and will be asked to sign to confirm that they will follow them.
- The Staff Disciplinary Policy and Visiting Lecturer Policy which are available to staff members in the Additional Staff Policies & Procedures on the P Drive are also obtainable from the HR Lead.
- The College General Administrator will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to [info@allnations.ac.uk](mailto:info@allnations.ac.uk)
- This policy will be included in staff and student induction.
- The policy and procedures will be monitored and reviewed annually by the Senior Leadership Team, and any necessary revisions adopted into the policy and implemented through our procedures.

- The policy statement will be reviewed annually by the Board of Trustees in Term 2 (January – March) when a report on the outcome of the annual safeguarding review will also be received.
- The College will submit an annual Prevent report to the OfS as requested (see Appendix 8 'Reporting to the OfS').
- The principal/CEO has responsibility for overseeing any complaints brought under the terms of this policy and ensuring that decision-making complies with all relevant regulatory bodies.

## 2.12 RELATED DOCUMENTS

- All Nations Christian College [Equality and Diversity Policy](#)
- All Nations Christian College [Freedom of Speech and Academic Freedom Policy](#)
- All Nations Christian College [Data Protection Policy](#)
- All Nations Christian College [Bullying, Harassment and Sexual Misconduct Policy](#)
- All Nations Christian College [Complaints Policy](#)
- All Nations Christian College [Student Disciplinary Policy](#)
- All Nations Christian College Staff Disciplinary Policy (see bullet point 3 in the previous section)

Signed: ..... Date: .....

Name: .....

College Principal / CEO

Signed: ..... Date: .....

Name: .....

Chair of Board of Trustees

### 3. SAFEGUARDING PROCEDURES

#### 3.1 INTRODUCTION

The following safeguarding procedures set out how the College's safeguarding policy is implemented in the life of the College.

Each member of the College (Trustee, worker (paid or voluntary), student (and their children), conference guest or visitor) is made aware of the policy and associated procedures, as appropriate, through:

- **Trustees**– induction/refresher training and annual updates (by external provider or DSL/Prevent Lead), annual review of safeguarding policy & procedures, annual safeguarding and Prevent report
- **Workers** – induction/refresher training and annual updates (by external provider or DSL/Prevent Lead), discussions relating to the policy and procedures
- **Students** – orientation/refresher training (by DSL/Prevent Lead) at the start of their time at College and updates as required (by DSL/Prevent Lead)
- **Children** – where possible (depending on the age and first language of the children) the DSL/Prevent Lead will meet with the children living on site at the start of each year (or at the start of their time at College) to outline/remind the children of the College's health & safety and safeguarding procedures. This may include giving the children a 'Staying safe' booklet.

#### 3.2 PROCEDURE FOR RECOGNISING, RESPONDING TO AND REPORTING ABUSE OR CONCERNS THAT A PERSON IS BEING RADICALISED OR DRAWN INTO TERRORISM

##### 3.2.1 *What to do if Abuse or Radicalisation is Suspected or Disclosed*

Abuse, neglect and radicalisation are forms of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm; somebody may seek to radicalise a person by preying on their vulnerability and encouraging them to support or be involved in extremist ideologies which can lead to being drawn into terrorism.

Children and adults at risk may be abused in a range of settings, by those known to them or, more rarely, by a stranger. There are many ways in which people suffer abuse. **Please see Appendix 1 for Definitions and indicators of abuse and Contexts and indicators of risk of radicalisation.**

Everyone has his or her part to play in helping to safeguard children and adults at risk within the life of the College. Abuse or radicalisation may be suspected:

- If there is a general concern about an individual's wellbeing
- If an individual informs another that something has happened or is happening to them
- If the behaviour, language or appearance of a child or adult at risk gives any cause for concern
- If an allegation is made in any context about a child or adult at risk being harmed
- If the behaviour of any individual towards children or adults at risk causes concern

### 3.2.2 *How to respond to a direct report of abuse:*

WHAT TO DO	WHAT NOT TO DO
<ul style="list-style-type: none"> <li>• Listen to and acknowledge what is being said.</li> <li>• Try to be reassuring &amp; remain calm.</li> <li>• Clarify your understanding of what you have been told (without pushing for more information)</li> <li>• Explain clearly what you will do and what will happen next.</li> <li>• Try to give them a timescale for when and how you / the DSL will contact them again.</li> <li>• Take action – don't ignore the situation.</li> <li>• Be supportive.</li> <li>• Tell them that:               <ul style="list-style-type: none"> <li>• They were right to tell you;</li> <li>• You are taking what they have said seriously; It was not their fault;</li> <li>• That you would like to pass this information on to the appropriate people, with their permission;</li> <li>• Be open and honest.</li> <li>• Give contact details for them to report any further details or ask any questions that may arise.</li> </ul> </li> <li>• Report your concern to the DSL without delay using MyConcern<sup>®</sup>. If urgent help required, seek out the DSL first.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not promise confidentiality.</li> <li>• Do not show shock, alarm, disbelief or disapproval.</li> <li>• Do not minimise what is being said.</li> <li>• Do not ask probing or leading questions, or push for more information.</li> <li>• Do not offer false reassurance.</li> <li>• Do not delay in contacting the DSL.</li> <li>• Do not contact the alleged abuser.</li> <li>• Do not investigate the incident any further.</li> <li>• Never leave a child or adult at risk waiting to hear from someone without any idea of when or where that may be.</li> <li>• Do not pass on information to those who don't need to know.</li> </ul>

### 3.2.3 *How to respond to concerns that an individual may be being radicalised or drawn into terrorism:*

#### **NOTICE - Are you concerned about a person?**

Perhaps you've noticed a change in behaviour; are they becoming withdrawn, prone to inexplicable outbursts or acting differently? Maybe a concerning change in appearance?

#### **CHECK - Don't ignore your concerns!**

Speak to the person directly, ask them if they are OK if you notice a change in behaviour or, if concerned about something they have said, check you have correctly understood them. If still concerned, check with others who may also have noticed something; talk to others who know them/academic tutors/support staff, to see if they share your concerns.

#### **SHARE - Don't keep your concerns to yourself!**

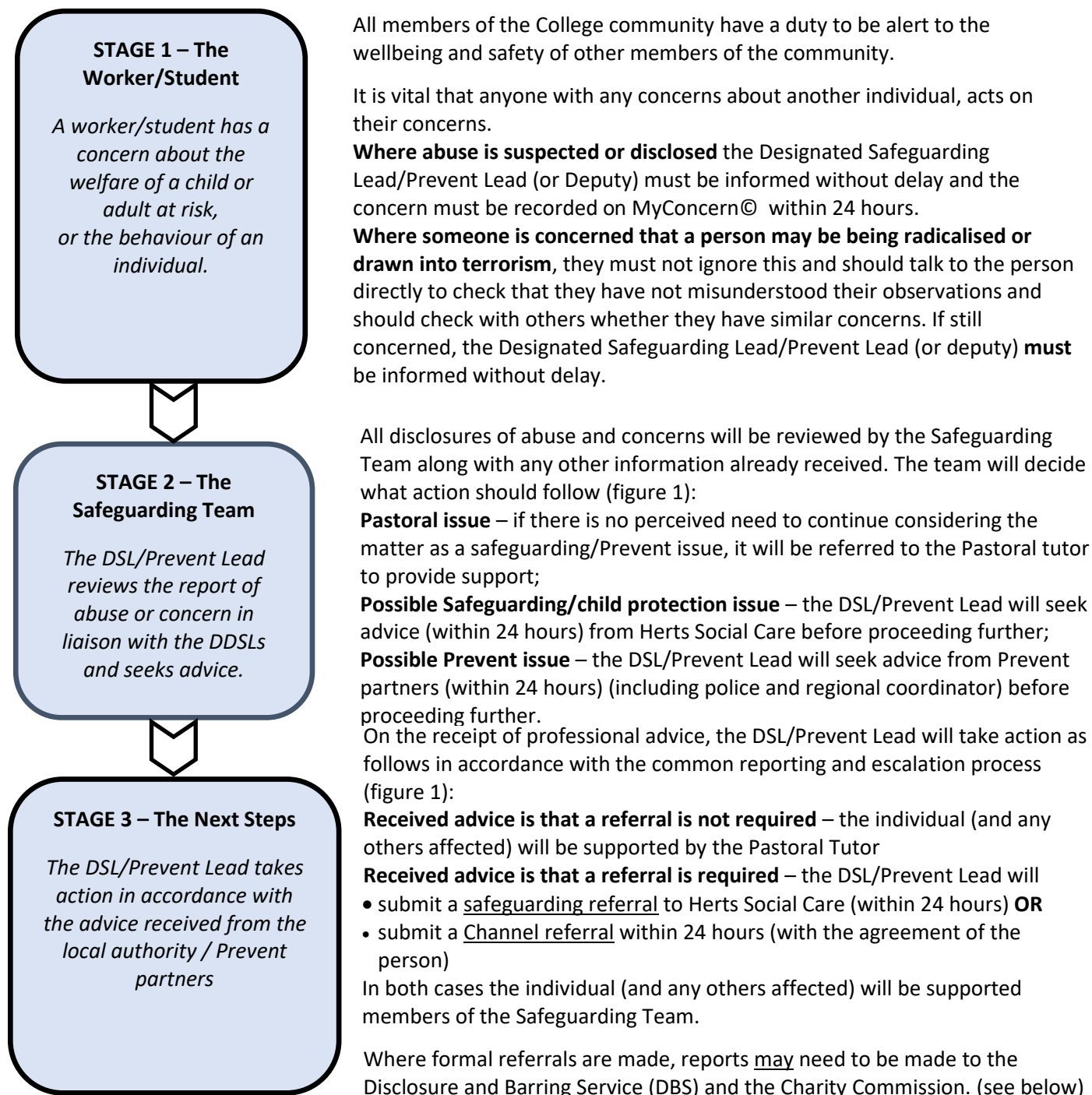
If you are still worried about the person, contact a member of the Safeguarding team to share your concerns\*. The team may be able to offer support and guidance to the person - the team will also consider carefully what to do next in order to further support them.

\* This step is the same as step 1 in the Responding to Concerns flow diagram in section 3.2.4

**If there is a threat to life and you believe an individual to be in serious, immediate danger call the police on 999 AND inform the Safeguarding/Prevent Lead (or deputy) or the Principal/CEO (or Vice Principal).**

### 3.2.4 Responding to Concerns

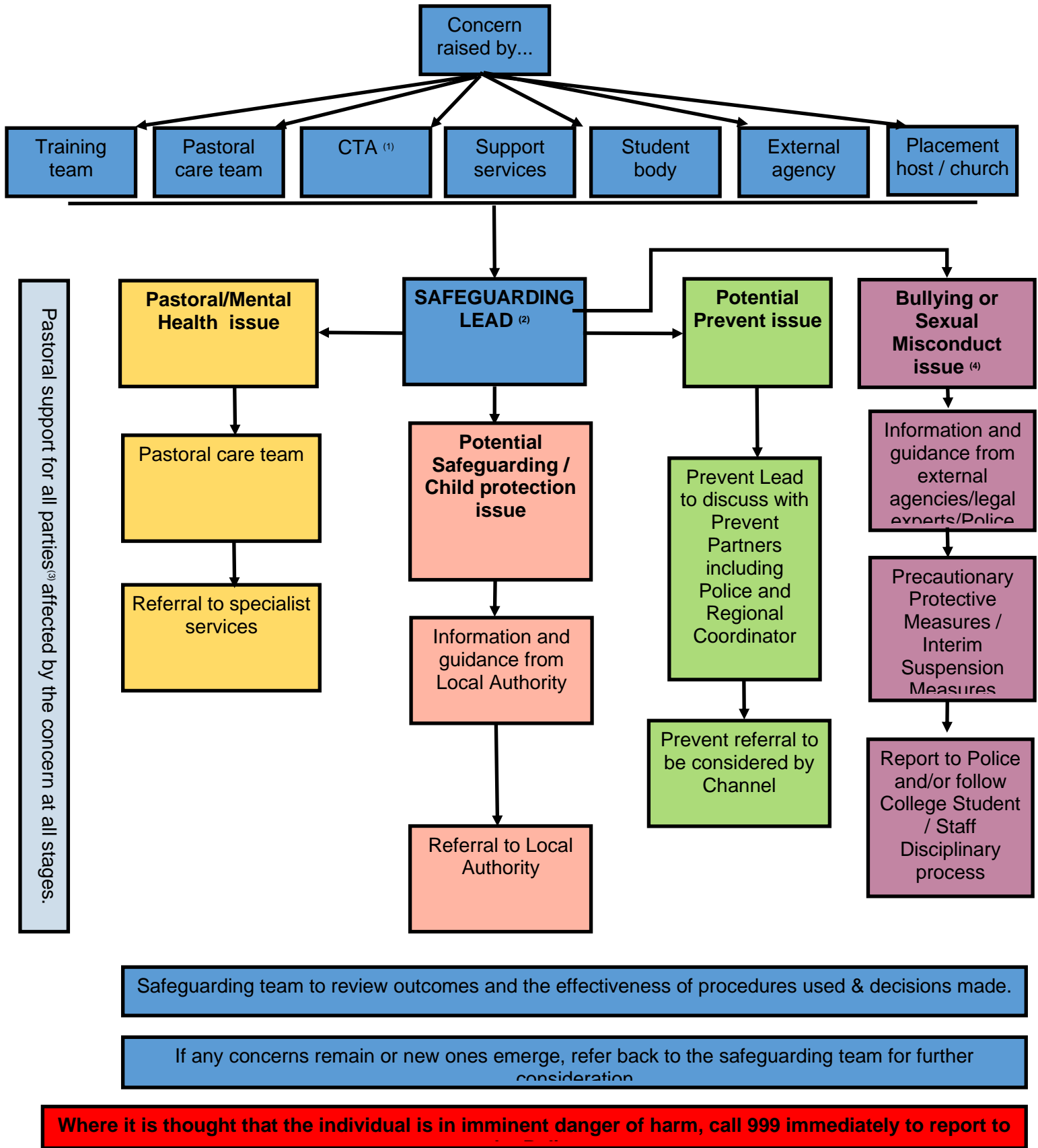
When there are concerns that an individual is being abused or is being drawn into terrorism, the following process must be followed. More detailed information can be found in Appendix 2.



If the DSL/Prevent Lead is not available, any reports or concerns should be passed to another member of the College Safeguarding/Prevent Team. The effectiveness of the procedures, decisions and outcomes will be kept under review.

**If you think that anyone is in imminent danger of harm, a report should be made immediately to the police by calling 999.**





\*Safeguarding Team consists of:

- Safeguarding Lead (& Prevent Lead)
- Deputy Prevent Lead
- Deputy Safeguarding Lead (& Pastoral tutor)

<sup>(1)</sup> CTA - Compliance and Training Administrator

<sup>(2)</sup> or Deputy Safeguarding Lead in the absence of the Safeguarding Lead

<sup>(3)</sup> where they are a member of the College community

<sup>(4)</sup> see [Bullying and Sexual Misconduct Policy](#) for further details

### **3.2.5 Responding to Concerns Raised about Adults at Risk**

When a concern is raised about an adult (including concerns that a person is being drawn into terrorism), it should be treated as above (see 3.2.4 above).

Always share your concerns with the DSL/Prevent Lead even if you do not have the consent of the adult to do so – in this instance, make sure the DSL/Prevent Lead knows that the person concerned has not given consent for the information to be passed on.

The Care Act 2014 provides helpful guidance on these situations:

*“If the adult has the mental capacity to make informed decisions about their safety and they do not want any action to be taken, this does not preclude the sharing of information with relevant professional colleagues. This is to enable professionals to assess the risk of harm and to be confident that the adult is not being unduly influenced, coerced or intimidated and is aware of all the options. This will also enable professionals to check the safety and validity of decisions made. It is good practice to inform the adult that this action is being taken unless doing so would increase the risk of harm”.*

It is not your role to decide whether someone has mental capacity, and is therefore able to make decisions that impact on their safety and well-being. Decisions on mental capacity are best made by professionals with the relevant background information to hand.

The DSL/Prevent Lead will consider all the information to hand and will seek advice from Herts Social Care or local Prevent partners. Based on the advice received, the DSL/Prevent Lead will decide whether it is appropriate for person to be supported in College by the Pastoral Tutor or whether to escalate the situation to statutory authorities for adult Social Care or a Channel panel (see appendix 2 for further information). If there are any concerns about an adult's mental capacity, the DSL/Prevent Lead will contact the Local Authority Adult Safeguarding Team for advice.

### **3.2.6 Allegations against Workers**

If you see another worker acting in ways which concern you, speak to the College Principal/CEO (or Vice Principal (Academic) in the in Principal/CEO's absence) about your concerns as soon as you can. This includes the actions or behaviours of those in leadership positions in the College.

College workers should encourage an atmosphere of mutual accountability, holding each other to the highest standards of safeguarding practice. The following procedure should be followed:

- 1) When an allegation of abuse has been made do not approach the alleged perpetrator about it
- 2) Report the allegation to the College Principal/CEO or Vice Principal (Academic) in the Principal/CEO's absence.
- 3) Once the allegation has been reported to the Principal, he will seek advice from Herts Safeguarding Children Partnership (including the Herts LADO) or the Herts Safeguarding Adults Board.
- 4) Whilst waiting for an outcome from the statutory authorities, the worker about whom concerns have been raised will be supervised as closely as possible, without raising suspicion
- 5) Once the statutory authorities are involved, the College will follow their advice with regard to the next steps to take (for example, suspension of worker, putting a contract in place, disciplinary process)
- 6) A written record of all discussions with statutory authorities or other parties should be maintained by the College Principal/CEO and HR manager and stored securely and confidentially (in accordance with the College's data retention schedule), where only those directly involved can access them.
- 7) No information about the allegation will be shared with people in the College other than those directly involved in safeguarding; not even for prayer purposes.

The suspension of a worker following an allegation is, by definition, a neutral act. Our priority as a College is to protect children and adults at risk from possible further abuse or from being influenced in any way by the alleged perpetrator.

It may be necessary, for the sake of the child / adult at risk or to satisfy the needs of an investigation, for the alleged perpetrator to work off-site until the completion of the investigation and any disciplinary process.

See Appendix 2 for further guidance on dealing with allegations against workers.

### **When concerns are expressed about the College Principal/CEO**

Any safeguarding concerns involving the College Principal/CEO must always be reported immediately to the Chair of the Board of Trustees in addition to following the College's usual procedures. Do not tell the College Principal/CEO that a concern has been raised about them.

### **When concerns are expressed about the DSL / Safeguarding Trustee / Chair of Board of Trustees**

Any safeguarding concerns involving the DSL, Safeguarding Trustee or Chair of the Board of Trustees must be raised with the College Principal/CEO. Do not tell the DSL / Safeguarding Trustee / Chair that a concern has been raised about them.

#### **3.2.7 Abuse of Trust**

Relationships between children and adults at risk and College workers can be described as 'relationships of trust'. The worker is someone in whom the child or adult at risk has placed a degree of trust. This may be because the worker has an educational role, is a provider of activities, or is even a significant adult friend. It is not acceptable for any College worker to form a romantic relationship with a child or adult at risk with whom they have a relationship of trust.

All College workers therefore need to be particularly aware of the need not to abuse their position of trust in their relationships with members of the College, whether colleagues, students or children.

#### **3.2.8 Allegations Made Against Children and Adults at Risk**

Children are by nature curious about sexual relations particularly in their teenage years. However, where a child is in a position of power, has responsibility over another child (as in a babysitting arrangement) and abuses that trust through some sexual activity, then this is abusive. Where one child introduces another child to age-inappropriate sexual activity or forces themselves onto a child, this is abusive. Such situations will be taken as seriously as if an adult were involved, because the effects on the child victim can be as great.

When such an instance occurs, they are investigated by the statutory authorities in the same way as if an adult were involved, though it is likely that the perpetrator would also be regarded as a victim in their own right, as they may have also been abused. It cannot be assumed that children will grow out of this type of behaviour, as most adult sex offenders started abusing in their teens or even younger.

Allegations against adults at risk will be investigated by the statutory authorities. If the alleged perpetrator is unable to understand the significance of questions put to them or their replies, they can access support from an 'appropriate' adult whilst they are being questioned. This role can be filled by a range of people, such as a family member, carer, social worker, etc. In court, adults at risk may be allowed to be assisted by an intermediary or give evidence through a live link.

When an allegation of abuse is made against a child or adult at risk the following procedure should be followed:

- 1) Do not approach the person about whom the allegation has been made or their parents / carers
- 2) Follow the College's responding to concerns procedure (section 3.2.4)
- 3) Seek advice from the DSL, who will speak to the police or social services about when to inform a parent. The DSL will also seek advice about what steps need to be taken to ensure the needs of both the victim and alleged perpetrator are met; this may include placing the child or adult at risk on a Safeguarding Contract or equivalent.
- 4) Make sure there is pastoral support in place for the child or adult at risk throughout the process involved.

### **3.2.9 Pastoral Care**

#### **3.2.9.1 Supporting those who have experienced abuse**

As a College, we are committed to caring for those who have experienced abuse. We recognise it is important that those who have experienced abuse:

- Are accepted for who they are, without being made to forgive or being put into a position of feeling guilty and responsible for what happened to them.
- Know that God loves them unconditionally, and that nothing can or will change this truth.
- Can be confident that those in the College community who know about the abuse are with them on their journey – no matter how long or difficult that journey may be.

It may be necessary to signpost individuals to specialist support. The DSL/Prevent Lead and Pastoral Tutor have a list of relevant local information and contacts, ready for anyone who may need it.

#### **3.2.9.2 Following an allegation of abuse against a worker or a member of the College community (see Appendix 2)**

When an allegation/suspicion arises in the College, a period of investigation will follow (see 3.2.6 above). The College will ensure that one person is responsible for dealing with the authorities, another offers support to the victim/s and their family, and another gives pastoral care to the alleged perpetrator, without compromising the alleged victims or their families. It may be necessary to appoint other people to support the families involved.

Where a statutory investigation is under way, this support will be provided with the knowledge of the statutory authority involved.

Where the perpetrator accepts some responsibility, they will be encouraged to seek specialised interventions/treatment to reduce the risk of re-offending. This may only be appropriate once the investigation and legal processes have been completed.

### **3.3 SAFER RECRUITMENT**

#### **3.3.1 Safer recruitment practices**

As a College, we are committed to safer recruitment practices. When recruiting both paid and volunteer College workers, the following process will be applied:

- 1) We will develop a clear role profile, person specification and application form;
- 2) All applicants will be asked to complete an application form and include the names of at least two referees;
- 3) Shortlisting of applicants will be carried out by at least two people, including the line manager or group leader directly overseeing the role being recruited for;
- 4) Interviews will be carried out by at least two people, including the line manager or group leader;
- 5) References, a Self-Disclosure Form and a DBS check (at a level appropriate to the post) must be completed satisfactorily before the appointed person starts in their role.

Note: Under the Criminal Justice and Court Services Act 2000, it is an offence for anyone disqualified from working with children or adults at risk to knowingly apply, accept or offer to work with children or adults at risk. It is also a criminal offence to knowingly offer work with children or adults at risk to an individual who is so disqualified or to knowingly allow such an individual to continue to work with children or adults at risk.

#### **3.3.2 Additional checks for paid workers**

In addition to the above checks, which should be completed for both paid and volunteer College workers, an applicant's UK residency status and/ or right to work in the UK will be checked when recruiting for a paid role. The College carries out additional checks on recruitment for the Principal/CEO, Head of Finance and trustees to make sure they are not disqualified from acting in those roles.

#### **3.3.3 References**

Formal written references will be requested, ideally in the form of at least one professional and one personal reference

#### **3.3.4 Appointment and Supervision**

The College's safeguarding policy and procedures will be discussed with the new worker/volunteer on induction and they will be required to sign their agreement to adhere to them. All workers will have a role description and clear lines of accountability to a leader and the leadership team.

Paid workers will also have an assigned supervisor whom they will meet with regularly to discuss work and address any issues or areas of concern. There will be a probationary period of six months in the role before any paid appointment is confirmed.

There will also be regular team meetings to review procedures, share concerns and identify other matters that may need clarification and guidance.

#### **3.3.5 Training**

The Designated Safeguarding Lead will ensure that all new workers undertake Safeguarding induction training on commencement. This training will include the College Safeguarding policy and procedures, the staff code of conduct (section 3.4.1) and the identity and role of the DSL. The Prevent Lead will ensure that all new workers undertake Prevent training (WRAP, Channel or other) appropriate to their role as soon as possible after the commencing work with the College.

It is important that all workers understand our College's agreed safeguarding procedures (including those for Prevent). All workers should receive safeguarding and Prevent updates as required and attend refresher Safeguarding and Prevent training at least annually. The training includes definitions of safeguarding, Prevent and abuse, responsibilities, identifying abuse and/or potential

radicalisation, how to respond and escalate concerns and/or disclosures of abuse, creating and maintain a safe environment, considering how safeguarding relates to mission.

The Designated Safeguarding Lead (and deputies) will undertake Level 3 Designated Safeguarding Lead training every 2 years with the local authority.

The Prevent Lead (and deputies) will undertake training (WRAP, Channel or other) at the commencement of their role and will also undertake update training (as appropriate) every year. A representative of the Prevent team will also attend regional HE Prevent Forum meetings arranged by the DfE Further and Higher Education Regional Prevent Co-ordinator.

Trustees receive induction training in Safeguarding and Prevent. This training will include the College Safeguarding policy and procedures and their responsibilities as members of the Board of Trustees. The DSL/Prevent Lead will arrange periodic meetings for the Board with the Regional Coordinator and other updates.

Attendance at safeguarding training is recorded and tracked by the Designated Safeguarding Lead through the maintenance of a Safeguarding training record. The Designated Safeguarding Lead will monitor the training undertaken by individuals in relation to their role and level of responsibility (to include the type and frequency of the training undertaken) to ensure that appropriate training is being undertaken. Responses to evaluations of safeguarding training are monitored by the Designated Safeguarding Lead to assess the effectiveness of the safeguarding training undertaken. The annual report to the Board includes a summary of the training undertaken by members of the College community, based on the data contained in the training record.

### **3.4 SAFER BEHAVIOUR**

#### **3.4.1 Code of Behaviour**

The College has a code of behaviour (set out below) for all those working with children and/or adults at risk so that everyone is shown the respect that is due to them:

**Code of Conduct** (see also Section 3 Best Practice Guidelines for further explanation)

- Treat everyone with dignity and respect.
- Use age and ability appropriate language and tone of voice. Be aware of your body language and the effect you are having on the child or adult at risk.
- Listen well to everyone. Be careful not to assume you know what a child or adult at risk is thinking or feeling. Listen to what is being spoken and how it is said. At the same time, observe the individual's body language to better understand what is being said.
- Be aware of any physical contact you may have with a child or adult at risk and record it when necessary; for instance, if you administer First Aid, give a hug to someone in distress, or protect yourself or others from danger.
- Do not make sexually suggestive comments about or to a child or adult at risk, even in 'fun'.
- Do not scapegoat, belittle, ridicule or reject a child or adult at risk.
- Record all incidents or concerns on MyConcern.® Enter the names of all those present and anything of note which you observe, e.g. details of any allegations made, etc. All workers who witnessed the incident, overheard it or responded in any way should record the details and sign and date the form.

## 4. BEST PRACTICE GUIDELINES

### 4.1 WORKING WITH CHILDREN

The College does not routinely organise activities for children. However, on the rare occasions when it does (e.g. for a public event), the following will apply:

#### 4.1.1 Consent forms

Important information about all children involved in any activities at the College, must be recorded on a consent form specific to the event. The consent form must be completed by the parent/carer. The consent form will record the child's name, medical emergency information and a contact name and number. Parents/carers will also be asked to consent to the College taking photographs and videos of their child during the event, which the College may later publish for marketing and publicity purposes. Further information about consent, what needs to happen if consent is not granted and how the images may be used will be provided for parents/carers on the consent form.

#### 4.1.2 DBS checks

Enhanced DBS certificates for workers (see also section 3.3) undertaking activities with children on behalf of the College will be obtained by the College prior to any worker having access to children.

#### 4.1.3 Ratios

Age range	Recommended minimum ratio for INDOOR activities	Recommended minimum ratio for OUTDOOR activities
0 – 2 years	1:3 (minimum 2)	1:3 (minimum 2)
3 years	1:4 (minimum 2)	1:4 (minimum 2)
4 – 7 years	1:8 (minimum 2)	1:6 (minimum 2)
8 – 12 years	2 adults for up to 20 children (preferably one of each gender) with an extra adult for every 10 additional children	2 adults for up to 15 children (preferably one of each gender) with an extra adult for every 8 additional children
13 years and over	2 adults for up to 20 children (preferably one of each gender) with an extra adult for every 10 additional children	2 adults for up to 20 children (preferably one of each gender) with an extra adult for every 10 additional children

This does not take into account special circumstances such as behavioural issues, developmental issues, and disability, which may mean an increase to the recommended ratios. Careful consideration should also be given to the gender balance of the children and the workers engaged with the children.

#### 4.1.4 Children with Special Needs

Children who have a disability can be at greater risk of abuse. They will often require more help with personal care, such as washing, dressing, toileting, feeding, mobility, etc. Some children may have limited understanding and behave in a non-age-appropriate way. It is good practice to speak with the parents/carers of children with special needs and find out from them how best to assist the child.

#### **4.1.5 Visiting Children at Home**

It is unlikely that workers will need to make pastoral visits to children and their families at home on behalf of the College. If a situation occurs where it is needed then it should be done in pairs, and with the prior agreement of the College Principal/CEO.

#### **4.1.6 One-to-one situations**

Adults in one-to-one situations with children are more vulnerable to allegations. Therefore, the following guidelines must be followed in one-to-one situations:

- Avoid being in a one-to-one situation unless absolutely necessary
- Keep the time spent in a one-to-one situation as brief as possible
- Ensure that, if the activity takes place in a room, both the adult and the child are visible through the viewing panel in the door (where practical, the room door should be kept open)
- Ensure that the child is closest to the door
- Speak clearly, without whispering, so that child does not need to come closer to hear

#### **4.1.7 Physical Contact**

- Keep everything public. A hug within a group context is very different from one behind closed doors.
- Physical contact should be related to the child's needs, not the worker's.
- Physical contact should be age-appropriate and generally initiated by the child rather than the worker.
- Workers must NEVER engage in any physical activity that is, or may be thought to be, sexually stimulating to the adult or the child (NB: Any form of sexual activity involving a child under 16 is illegal; any form of sexual activity with a child under 18 by an adult in a position of responsibility is abuse)
- Children are entitled to privacy to ensure their personal dignity.
- Children have the right to decide how much physical contact they have with others, except in exceptional circumstances such as when they need medical attention or where they need to be restrained in order to avoid injury to themselves or others
- When giving first aid (or applying sun cream, etc), workers should encourage the child to do what they can manage themselves, but consider the child's best interests and give appropriate help where necessary.
- Team members should monitor one another in the area of physical contact. They should help each other by constructively challenging anything which could be misunderstood or misconstrued.

#### **4.1.8 Filming and photographing children**

- Obtain the child's parent's permission to photograph or film the child and to publish their image; it must be made clear why that child's image is being used, what it will be used for and who might want to look at the pictures. For official College events, this permission is sought through the Consent form the event (see above)
- Only use images of children in suitable clothing to reduce the risk of inappropriate use, e.g. do not take photographs of children in swim wear or when partially clothed.
- When using photographs of children, it is preferable to use group pictures.
- If publishing press releases, articles, films or photographs, do not use children's names; if a child is named, avoid using a photograph



#### **4.1.9 Procedure to follow if a child goes missing from an organised activity (including non-resident children)**

- Check with other workers involved in the activity as to the whereabouts of the child
- Establish where and when the child was last seen, who they were with and compile a description of the child for others involved in searching for the child
- Check that the child has not joined another group or activity
- Check with Reception whether they know if the child has left the premises with a parent or another family
- Ensure that the rest of the children in the activity are safe whilst a thorough search is conducted of the premises, inside and out. With support from others check everywhere, including unlikely areas, anywhere a child could hide.
- Check the grounds surrounding the College
- Whilst checking, call out to the child in a non-threatening way
- If all possibilities have been explored and the child cannot be accounted for, the Principal/CEO must be informed (or the Vice Principal in his absence) and the parents must be contacted. If the parents cannot account for the whereabouts of the child it will be necessary to phone the police.
- Provide reassurance and support to the parents
- The Principal/CEO (or Vice Principal) will convene a meeting of the Critical Incident Team and put the College's Critical Incident Plan into operation
- Cooperate with the police enquiries by giving a full description of the incident and assist, as directed, in subsequent police-led searching.

#### **4.1.10 Procedure to follow if a resident child is missing from the site**

- Establish with the child's parent(s) where and when the child was last seen and who they were with
- Obtain a full description from the child's parent(s)
- Check with Reception whether they know if the child has left the premises with another family
- With support from others conduct a thorough search of the site - check everywhere, including unlikely areas, anywhere a child could hide.
- Check the grounds surrounding the College
- Whilst checking, call out to the child in a non-threatening way
- If all possibilities have been explored and the child cannot be accounted for the police must be contacted. The Principal/CEO must also be informed (or the Vice Principal in his absence)
- Provide reassurance and support to the parents
- Cooperate with the police enquiries by giving a full description of the incident and assist, as directed, in subsequent police-led searching.

## **4.2 WORKING WITH ADULTS AT RISK**

### **4.2.1 Premises**

The College building will be made as accessible as possible to all legitimate users. Any restrictions to access, visibility, audibility, toilet facilities, lighting or heating will be addressed wherever possible, and where necessary, aids and adaptations put in place.

### **4.2.2 Language**

In celebration of the College's multi-cultural community, every effort will be taken to use appropriate language and suitable vocabulary, enabling the greatest level of inclusivity and accessibility. We will be mindful of the language used within worship, actively encouraging the use of multi-languages, and the language used to describe people

### **4.2.3 Worship**

In all worship services, we will consider the varied requirements of our congregation and try to be as inclusive as possible, by:

- Providing some copies of large print type for all printed materials (where required)
- Speakers always facing the congregation and not covering their mouths when talking, enabling those who rely on lip-reading
- Describing what is being presented on a screen (where possible)
- Using inclusive language
- Using a variety of liturgy and resources to cater for different cultures, languages and levels of understanding
- Using a microphone for leading, preaching, during times of open prayer and for giving notices so that all can hear

### **4.2.4 Insurance**

We will take reasonable steps to safeguard adults at risk and will follow any specific safeguarding requirements as laid out by our insurance company.

### **4.2.5 Financial integrity**

Arrangements are in place for dealing with money, financial transactions and gifts, as outlined below:

- Those who work with adults at risk may become involved in some aspects of personal finance. If handling money for someone else, always obtain receipts or other evidence of what has been done.
- Workers should not seek personal financial gain from their position beyond any salary or recognised allowances or expenses.
- Workers should not be influenced by offers of money.
- Any monetary gifts received should be reported to the Principal/CEO, who should decide whether or not the gift can be accepted.
- Any cash amounts received by the College should be handled by two unrelated College workers where practically possible.
- Care should be taken not to canvass for College donations from those adults who may be at risk, such as the recently bereaved.
- Workers should ensure that College and personal finances are kept apart to avoid any conflict of interest.
- Workers are advised not to act as Executors for someone they know through their work or pastoral role, as this may lead to a conflict of interests.

- Expert legal advice should be sought on matters such as Power of Attorney and Appointee-ship to ensure that the situation is clearly understood and is the most appropriate course of action for the adult at risk.
- The College's financial procedures should be followed at all times

#### **4.2.6 Photographs**

Workers should make sure that they have the person's permission to take a picture, and that the subject is happy with the intended use of the pictures. When taking group pictures, workers should remember to get permission from everyone who will be photographed.

Photographing students and most especially posting the photo on social media may cause harm to a student in the future if they later work in a sensitive country. In addition to the College protocols, the Placement handbook reminds placements of this risk but it is also the responsibility of such students to highlight this risk to their placement.

Protocols regarding the Staff and Student photos (displayed in the Dining Room) are:

- All staff and students are informed by the College before any photos are taken that if they do not want their image to be used in any way, they must put it in writing to the Communications Administrator.
- Photos of staff and current students are displayed in the Dining Room whilst they are studying or working at College.
- Permission is given by parents to display their child's photo on the wall; they are only displayed during the academic terms that the parents are studying at the college
- When a student or family leave, the photos are removed and added to the student's or family's file, which is kept in a locked filing cabinet at reception.
- Staff and Students who may work in sensitive countries are asked to place a red dot on their photo on the Dining Room notice-board to indicate that their image must be used with caution.
- Permission must be granted by the subject, before posting a photo containing an image which has a red dot on the photo (as per the College [Social Media Policy](#)).
- Rules and good practice governing the use of photos containing children (see section 4.1.8) will be placed on the Dining Room with the photo display.

#### **4.2.7 Alumni newsletters**

Protocols are in place for the handling, storage and disposal of alumni newsletters, especially when they contain pictures of children or they work in a sensitive country. These are:

- As soon as a newsletter has been received (post) or printed (email) it is locked away in a filing cabinet by the Network Prayer secretary until it is recorded on the College Donorfy database.
- Newsletters are filed with the rest of the family's information in the designated locked filing cabinet
- They are finally shredded when no longer required

#### **4.2.8 Acceptable Use of ICT:**

Orientation includes highlighting the College's [Acceptable Use of ICT Policy](#) and Procedures and the College's intolerance for any misuse that could harm others.

The College will block access through its network to specific known websites, network resources and IP addresses that provide or facilitate access to extremist materials that would contravene the College's Prevent Duty obligations. Staff and students wishing to view material for legitimate research on websites whose access has been disabled by targeted filtering should follow the College's [Research Ethics Policy](#) and procedures. Orientation will include highlighting these

policies and procedures to new and returning students and reiterate the College's intolerance for any behaviour that causes harm to others.

#### **4.2.9 Record keeping**

It is good practice to maintain records of pastoral meetings, noting the date, time, location, subject and any actions which are to be taken. The record of these meetings should be limited to facts rather than including opinion. If any opinions are recorded it should be noted whose opinion it is. Any records of safeguarding allegations, concerns or disclosures must be recorded on MyConcern<sup>®</sup> and passed on to the DSL. All subsequent actions and new information must be recorded on MyConcern<sup>®</sup>.

#### **4.2.10 Pastoral Relationships**

All those involved in a tutorial role or pastoral support should work in a way that follows clearly defined procedures, which set out the boundaries to protect those carrying out the tutorial role or pastoral support as well as those receiving it:

- Workers should be aware of the power imbalance within tutorial/pastoral relationships and the potential for abuse of trust.
- Behaviour that suggests favouritism or gives the impression of a special relationship, should be avoided.
- Workers should be aware of the dangers of dependency within a tutorial/pastoral relationship.
- Workers should never take advantage of their role and engage in sexual activity with someone with whom they have a tutorial/pastoral relationship.
- All people receiving tutorial/pastoral support should be treated with respect and should be encouraged to make their own decisions about any actions or outcomes.
- Workers should not provide tutorial/pastoral support to anyone whilst under the influence of alcohol or drugs.
- Workers need to recognise the limits of their own abilities and competencies, and get further help when working with situations outside of their expertise or role.

## **4.3 HEALTH AND SAFETY - Safe Practice and Safe Premises**

### **4.3.1 *Health and Safety***

All College activities will comply with the College's current health and safety policy and procedures. All members of staff receive a copy of the current health and safety policy and receive training appropriate to their post.

All groups who hire the College facilities are provided with a copy of the current Health and Safety policy and are required to comply with it all times. ([Conference Lettings policy](#)).

### **4.3.2 *Fire***

It is the responsibility of all responsible persons/group leaders within the building to ensure the safety of themselves and those who are in their care. In addition, it is a legal requirement that all responsible persons/group leaders are familiar with the emergency procedures in the event of a fire.

### **4.3.3 *First Aid***

The College has a number of trained First Aiders and there is a list showing who they are on noticeboards around College. First Aid kits are located in Reception, the College kitchen and the College administrator's office. The College administrator ensures that the contents of the first aid kits are checked and restocked on a regular basis. Completed accident forms should be passed on to the College Administrator.

### **4.3.4 *Risk Assessments***

Risk assessments, including fire risk assessments, are in place to cover each of the areas of the College, activities and the use of equipment. Before undertaking any activity or event involving children or adults at risk, the leader will ensure that a risk assessment is carried out. The College also maintains a safeguarding risk assessment and a Prevent risk assessment. Each of the risk assessments are reviewed on an annual basis or as the result of feedback received.

### **4.3.5 *Contractors***

Contractors should be made aware of and are expected to uphold the general requirements of the Safeguarding policy and Prevent Duty in fulfilling their duties within the College.

## 4.4 SAFER COMMUNITY

### 4.4.1 Admission of students

All students wishing to study at the College are required to declare (in Part B of the Application form) whether they have any restrictions placed upon them or any unspent criminal convictions (under the Rehabilitation of Offenders Act, 1974). (See Section 8 of the [Admissions policy](#)).

Any successful applicant who has declared that they are subject to any restrictions or have any unspent criminal conviction(s) will be informed (in a conditional offer letter) that a risk assessment will need to be conducted first by the College Safeguarding team and a satisfactory conclusion reached (which may require a safeguarding contract to be agreed) before the offer of a place can be confirmed.

Prior to joining the College community, everyone who wishes to work, live or study on our site is required to obtain a Basic DBS (Disclosure and Barring Service) certificate and present this to the HR Manager (staff/resident volunteers) or **their course's training administrator (students)**. Anyone who has lived or studied overseas for more than 3 months must provide the College with a Certificate of Good Conduct (or equivalent) from those countries in which they have lived for more than 3 months.

The HR manager/training administrator will record the date of these certificates and when they were seen. With the person's consent, a copy of the certificate(s) will be placed on the individual's file. Should the certificate(s) record any previously undeclared unspent criminal convictions, the appropriate disciplinary process (student or staff) will be undertaken.

Any student wishing to undertake a volunteering role working with children or adults at risk (e.g. as part of a ministry placement), is required to obtain an enhanced DBS certificate prior to starting the role.

### 4.4.2 Bullying

(See the College [Bullying, Harassment and Sexual Misconduct Policy](#)) Bullying is a recognised form of abuse, and it can be verbal or physical. Bullying doesn't just happen to children, often adults can be victims too. There is no legal definition of bullying, but it is usually defined as a repeated pattern of behaviour intended to cause emotional or physical harm to another person, or exert power over them. The effect of bullying on the victim can be profound, both emotionally and physically, regardless of their age, ability or status.

It is important to recognise that the College is not exempt from the risk of bullying and that bullying is not isolated to the children. Anyone in the College can be a victim of bullying, just as anyone in the College can be the bully, including those in leadership.

Some examples of bullying that could arise in the College context are:

- Being verbally or physically abusive towards another person
- Isolating or deliberately ignoring someone, or excluding them from group activities
- Spreading rumours and malicious untruths about another person in the College
- Use of email, phone or social media to publicly challenge or undermine someone
- Name calling and personal insults
- Making false accusations
- Sending abusive messages or degrading images via phone, email or social media

Bullying will always cause a great deal of pain and harm for those on the receiving end. Many people affected by bullying, both children and adults, believe they have nowhere to turn. They are scared to speak out and often blame themselves. They can become fearful and reclusive. It is important that all members of the College are able to recognise when bullying is occurring and are prepared to take action to resolve the situation.

Some signs that can indicate a person is being bullied are as follows:

- Withdrawal from group or College activities; appearing anxious, tearful or more reticent than usual, particularly in a certain context; development of mental health difficulties, such as depression or anxiety disorders; drop in performance relating to any College roles; physical injuries.

In order to help prevent bullying, the following procedures will be adopted within the College:

- The College will display signs stating the importance of valuing and respecting each other even in disagreements and this will be practically embedded into the leadership approach to others.
- Everyone in the College, whether children or adults, should know how they can report any incidents of bullying using the College's concerns reporting process (see section 3.2.4)
- All allegations of bullying will be treated seriously and details will be carefully checked before action is taken.
- The bullying behaviour will be investigated and bullying will be stopped as quickly as possible.
- An attempt will be made to help bullies change their behaviour.
- All allegations and incidents of bullying will be recorded, together with the actions that are taken.
- Incidents of bullying may be reported to the statutory authorities in line with the College safeguarding procedures.

It is important to distinguish bullying from other behaviour, such as respectfully challenging or disagreeing with someone else's beliefs or behaviours, setting reasonable expectations with regard to work deadlines and activities or taking legitimate disciplinary action.

#### **4.4.3 Ministry placements and Ministry internships**

All students doing accredited courses are required to gain experience through a weekly Ministry Placement (MP) and those completing Diploma and BA courses are required to do a 3-week Ministry Internship (MI) during Level 5.

The objective of both types of ministry placements is to ensure that students get an opportunity to apply classroom based learning in a practical context, experience the dynamics of working under supervision in a multicultural context, identify and develop personal gifts and abilities as part of a team.

Where the ministry placement or ministry internship involves working with children or adults at risk, the Ministry Placement tutor will work with the placement organisation to ensure that an enhanced DBS check has been obtained for the student prior to them starting their placement or internship.

Safeguarding protocols for students undertaking ministry placements and ministry internships are outlined in the separate College document 'Guidelines for security of students on ministry internships & placements'.

#### **4.4.4 Freedom of speech**

The College will not suppress freedom of thought and speech. However, the College has a duty to ensure, wherever practical, that such thoughts and expressions, including those expressed via social media, do not constitute incitement to riot, insurrection, racial hatred, religious hatred, sexual harassment or other activities (beyond the right of peaceful protest) which are likely to cause a breach of the peace or public disorder or otherwise to be unlawful. The College's commitment to fulfil these two aims is enshrined in the College's [Freedom of Speech and Academic Freedom policy](#) and [Equality and Diversity Policy](#).

#### **4.4.5 Student engagement**

All reasonable efforts are taken to engage with students to formulate and support the College's response to Safeguarding and Prevent issues including this document. The agenda for the regular meetings between the Head Students and the Principal/CEO and the DSL/Prevent Lead always include safeguarding/Prevent.

#### **4.4.6 Speakers and events**

All proposed visiting speakers who will be speaking on topics not related to the curriculum of the College must be approved by the Senior Leadership team before being permitted to speak to any section of the College community. Once approved by the Senior Leadership Team, the speaker must read and sign a 'Speaker's Agreement' in which they declare that in delivering their speech they will 'neither illegally express extremist\* ideology which could draw others into terrorism, nor express themselves in any way which would constitute incitement to riot, insurrection, racial hatred, religious hatred, discrimination, harassment or in any other way which is illegal.' (\*For the purpose of this document we are using the UK Government's definition of extremism which is 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. Extremism also includes calls for death of members of the armed forces.")

All proposed events must be planned using the College Event Organisation Request Form and Guidelines and the College's Procedure for Approving External Events and Speakers which takes account of Prevent. All events must be authorised by the Senior Leadership Team.

In the event that a speaker causes a Safeguarding or Prevent related concern, the DSL/Prevent Lead should be informed using the Responding to Concerns procedure (section 3.2.4)

The College requires all permanent lecturers to comply with the [Freedom of Speech and Academic Freedom policy](#). The College Visiting Lecturer Policy and Procedure requires all visiting lecturers to do the same (See above).

#### **4.4.7 Hiring of College Premises**

The hirer will appoint an event organiser to be responsible for liaising with the College on all details of the booking. The event organiser will be sent a copy of the [Conference Lettings policy](#) and the Safeguarding policy and will meet with the Conferences Manager prior to the event in order to confirm arrangements for the booking and to provide site orientation (including health & safety and safeguarding arrangements) to the event organiser.

Visiting speakers are required to sign the College speaker's agreement (a statement agreeing to speak within the law e.g. not to draw others into terrorism or causing public disorder etc). This agreement is set out in the College's Procedure for Approving External Events and Speakers.



## 5. USEFUL CONTACTS

Designated Safeguarding Lead (DSL) / Prevent Lead	Steve Tompkins - 01920 443518 s.tompkins@allnations.ac.uk
Deputy Designated Safeguarding Lead (DDSL) / Pastoral Care tutor	Jan Barlow - 01920 443500 j.barlow@allnations.ac.uk
Deputy Prevent Lead	Vacant
Interim College Principal / CEO	V.J. Samkutty - 01920 443525 v.j.samkutty@allnations.ac.uk
Compliance Officer	Steph Cramphorn - 01920 443519 s.cramphorn@allnations.ac.uk
College General Administrator	Karen Herbert 01920 443534 k.herbert@allnations.ac.uk
HR Manager	Ann Voortman 01920 443524 HR@allnations.ac.uk
Concerns that a child (under the age of 18) is in need or is at risk of being abused or neglected	Hertfordshire Safeguarding Children Partnership <b>0300 123 4043</b>  Or call 999 if a child is in immediate danger or if a crime is being committed Hertfordshire Adult Social Care <b>0300 123 4042</b>
Concerns about that an adult at risk (over the age of 18) is in need or is at risk of being abused or neglected	  Or call 999 if an adult is in immediate danger or if a crime is being committed Hertfordshire Mental Health - 0300 7770707 Or call 999 if an adult is in immediate danger
Mental Health concerns (adults)	Hertfordshire Mental Health - 0300 7770707 Or call 999 if an adult is in immediate danger
Mental Health concerns (adults with children)	Hertfordshire Social care Communications Hub 01438 737511
NSPCC 24 hours helpline	0808 800 5000
Reporting allegations of abuse against a worker or member of the College	Local Area Designated Officer Hertfordshire Safeguarding Children Partnership 01992 555420 101
Police (non-emergency) Can be used to access Herts Prevent team To report suspected terror-related activity FE/HE Regional Prevent Coordinator for East of England OfS Prevent Team	Police Hotline - 0800 789321 or 999 David Layton-Scott - 07384 452155 <a href="mailto:David.LAYTON-SCOTT@education.gov.uk">David.LAYTON-SCOTT@education.gov.uk</a> 0117 931 7128 <a href="mailto:prevent@officeforstudents.org.uk">prevent@officeforstudents.org.uk</a> Herts Prevent team <a href="mailto:Prevent@Herts.pnn.police.uk">Prevent@Herts.pnn.police.uk</a> Community Safety Co-ordinator East Herts Council - 01992 531596 Community/Safety@eastherts.gov.uk
Police Prevent Duty Partner	
East Herts Council Prevent Duty Partner	

## 6. APPENDIX 1 - DEFINITIONS OF ABUSE

### ***UNDERSTANDING, RECOGNISING AND RESPONDING TO ABUSE***

Abuse and neglect are forms of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult by inflicting harm, or by failing to act to prevent harm. Children and adults at risk may be abused in a family, or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or a child or children. There are many different ways in which people suffer abuse. The list below gives indicative examples for each type of abuse, but is not exhaustive.

<b>Type of abuse</b>	<b>Child</b>	<b>Adult at risk</b>
<b><i>Physical</i></b>	Actual or likely physical harm to a child, or failure to prevent physical harm to a child. It may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.	To inflict pain, physical injury or suffering to an adult at risk.
<b><i>Emotional</i></b>	The persistent, emotional maltreatment of a child such as to cause severe and persistent adverse affects on the child's emotional and behavioural development. It may involve conveying to the child that they are worthless and unloved, inadequate, or that they are given responsibilities beyond their years. It may involve serious bullying or witnessing the ill-treatment of another.	The use of threats, fear or power gained by another adult's position, to invalidate the person's independent wishes. Such behaviour can create very real emotional and psychological distress. All forms of abuse have an emotional component.
<b><i>Sexual</i></b>	Involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This includes non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.	Any non-consenting sexual act or behaviour.  No one should enter into a sexual relationship with someone for whom they have pastoral responsibility or hold a position of trust.
<b><i>Neglect</i></b>	Where adults persistently fail to meet a child's physical and/or psychological needs, likely to result in the serious impairment of the child's physical or mental health and development. It may involve the failure to protect a child from harm or danger.	A person's wellbeing is impaired and their care needs are not met. Neglect can be deliberate or can occur as a result of not understanding what someone's needs are.

## **Type of Abuse    Additional Definitions**

<b>Financial</b>	The inappropriate use, misappropriation, embezzlement or theft of money, property or possessions.
<b>Spiritual</b>	The inappropriate use of religious belief or practice; coercion and control of one individual by another in a spiritual context; the abuse of trust by someone in a position of spiritual authority. The person experiences spiritual abuse as a deeply emotional personal attack.
<b>Discrimination</b>	The inappropriate treatment of a person because of their age, gender, race, religion, cultural background, sexuality or disability.
<b>Institutional</b>	The mistreatment or abuse of a person by a regime or individuals within an institution. It can occur through repeated acts of poor or inadequate care and neglect, or poor professional practice or ill-treatment. The College as an institution is not exempt from perpetrating institutional abuse.
<b>Domestic Abuse</b>	Domestic abuse is any threatening behaviour, violence or abuse between adults who are or have been in a relationship, or between family members. It can affect anybody regardless of their age, gender, sexuality or social status. Domestic abuse can be physical, sexual or psychological, and whatever form it takes, it is rarely a one-off incident. Usually there is a pattern of abusive and controlling behaviour where an abuser seeks to exert power over their family member or partner.
<b>Cyber Abuse</b>	The use of information technology (email, mobile phones, websites, social media, instant messaging, chatrooms, etc.) to repeatedly harm or harass other people in a deliberate manner.
<b>Self-harm</b>	Self-Harm is the intentional damage or injury to a person's own body. It is used as a way of coping with or expressing overwhelming emotional distress. An individual may also be neglecting themselves, which can result in harm to themselves.
<b>Mate crime</b>	'Mate crime' is when people (particularly those with learning disabilities) are befriended by members of the community, who go on to exploit and take advantage of them.
<b>Modern Slavery</b>	Modern slavery is the practice of treating people as property; it includes bonded labour, child labour, sex slavery and trafficking. It is illegal in every country of the world.
<b>Human Trafficking</b>	Human trafficking is when people are bought and sold for financial gain and/or abuse. Men, women and children can be trafficked, both within their own countries and over international borders. The traffickers will trick, coerce, lure or force these vulnerable individuals into sexual exploitation, forced labour, street crime, domestic servitude or even the sale of organs and human sacrifice.
<b>Radicalisation</b>	The radicalisation of individuals is the process by which people come to support any form of extremism and, in some cases, join terrorist groups. Some individuals are more vulnerable to the risk of being groomed into terrorism than others. (See Contexts and Indicators of risk of radicalisation below)
<b>Honour / Forced Marriage</b>	An honour marriage / forced marriage is when one or both of the spouses do not, or cannot, consent to the marriage. There may be physical, psychological, financial, sexual and emotional pressure exerted in order to make the marriage go ahead. The motivation may include the desire to control unwanted behaviour or sexuality.

**Female  
Genital  
Mutilation**

Female genital mutilation (FGM) comprises all procedures involving partial or total removal of the female external genitalia or other injury to the female genital organs for non-medical reasons as defined by the World Health Organisation (WHO). FGM is a cultural practice common around the world and is largely performed on girls aged between 10 and 18. Performing acts of FGM is illegal in the UK as is arranging for a child to travel abroad for FGM to be carried out.

**Child Sexual  
Exploitation  
(CSE) and  
Child Criminal  
Exploitation  
(CCE)**

Forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. In some cases the abuse will be in exchange for something the victim needs or wants and/or will be to the financial or other advantage of the perpetrator(s).

**Historic  
Abuse**

Historic abuse is the term used to describe disclosures of abuse that were perpetrated in the past. Many people who have experienced abuse don't tell anyone what happened until years later, with around one third of people abused in childhood waiting until adulthood before they share their experience.

Whilst it is not possible to be prescriptive about the signs and symptoms of abuse and neglect, the following list sets out some of the indicators which might be suggestive of abuse:

- unexplained injuries on areas of the body not usually prone to such injuries
- an injury that has not been treated/received medical attention
- an injury for which the explanation seems inconsistent
- a child or adult at risk discloses behaviour that is harmful to them
- unexplained changes in behaviour or mood (e.g. becoming very quiet, withdrawn or displaying sudden bursts of temper)
- inappropriate sexual awareness in children
- signs of neglect, such as under-nourished, untreated illnesses, inadequate care.

**It should be recognised that this list is not exhaustive and the presence of one or more indicators is not in itself proof that abuse is actually taking place. It is also important to remember that there might be other reasons why most of the above are occurring**

## **CONTEXTS AND INDICATORS OF RISK OF RADICALISATION**

Guidance is clear that there is no single way to identify who is likely to be vulnerable to being drawn into terrorism. However, the following indicators may be helpful in identifying individuals at risk of being radicalised and drawn in terrorism:

<b>Contexts of risk</b>	<b>Indicators of risk</b>
<ul style="list-style-type: none"> <li>• Living in a conflict/war zone and/or observing acts of injustice</li> <li>• Experiencing the loss of or separation from family members or witnessing perceived or actual injustice</li> <li>• A need for identity, meaning or belonging</li> <li>• Certain mental ill-health issues such as depression, anxiety, PTSD and relational or personality problems</li> <li>• A desire for excitement and adventure</li> <li>• A need to dominate others</li> <li>• Susceptibility to indoctrination</li> <li>• Dependence on relationships built on social media</li> <li>• Being at a transitional time of life</li> <li>• Being influenced or controlled by a group</li> <li>• Opportunist involvement with groups or individuals</li> <li>• A desire for political or moral change</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence of withdrawing or isolating themselves from others and/or being secretive</li> <li>• Extreme moods</li> <li>• Third party reports of concerns about behaviour (e.g. plans to take extended leave to destinations associated with terrorism)</li> <li>• Exclusion of groups or individuals from activities which appears to be for extremist or discriminatory reasons</li> <li>• Direct disclosure from the individual of vulnerability to being drawn into terrorism or extremism</li> <li>• Evidence of friends or family concern about vulnerability to extremism</li> <li>• Evidence of discriminatory treatment of other groups or individuals</li> <li>• Evidence of non-compliance with normal expectations of behaviour or shared values within society</li> <li>• Possessing, accessing or requesting extremist materials unless authorised to do so for academic study</li> <li>• Expression of extremist views and sharing of extremist materials including on social media</li> <li>• Use of extremist language, expressing openness to violent solutions to world problems</li> <li>• Threats of violence</li> <li>• Inviting visitors to College who are a cause for concern in the context of radicalisation/terrorism</li> </ul>

## 7. APPENDIX 2 – DETAILED GUIDANCE

**At any stage if it is thought that there is a threat to life or that a child or adult is in imminent danger, the police must be called on 999 immediately.**

### **REPORTING REQUIREMENTS AND ESCALATING CONCERNS**

#### **STAGE 1 – THE WORKER/STUDENT**

All members of the College community have a duty to be alert to the wellbeing and safety of other members of the community.

Should you **NOTICE** any changes in a person's behaviour, attitudes, appearance or the type of language that they use that concern you **CHECK** out these concerns either by speaking directly to the person concerned or by talking about your concerns with others who know the person e.g. fellow students, academic tutors, support staff unless to do so may place the individual at risk of harm.

If you are still concerned after checking your concerns with others, then **SHARE** your concerns with the Designated Safeguarding Lead(DSL)/. DSL/Prevent Lead is not contactable, or they are implicated in the situation, another member of the College Safeguarding Team should be contacted instead.

Concerns must be passed on to the DSL/Prevent Lead within 24 hours of the concern being raised by recording the concern on MyConcern<sup>®</sup>. If there is a threat to life and you believe an individual to be in imminent danger of harm, a report should be made immediately to the police by calling 999. If such a report is made without reference to the DSL/Prevent Lead, they and the College Principal/CEO should be informed as soon as possible afterwards.

**Where a concern cannot be recorded on MyConcern<sup>®</sup>, a written record using the standard incident report form should be made as soon as possible after a child or adult at risk tells you about harmful behaviour, or an incident takes place that gives cause for concern. The record should:**

- be hand-written as soon as possible after the event
- be legible and state the facts accurately (when hand-written notes are typed up later the original hand-written notes should be retained)
- include the child or adult at risk's name, address, date of birth (or age if the date of birth is not known)
- include the nature of the concerns/allegation/disclosure
- include a description of any bruising or other injuries that you may have noticed
- include an exact record of what the child or adult at risk has said, using their own words where possible
- include what was said by the person to whom the concerns were reported
- include any action taken as a result of the concerns
- be signed and dated
- be kept secure and confidential and made available only to the College Safeguarding Team and representatives of any statutory authorities involved.

If an issue concerns an adult at risk who does not give permission to pass on the information to anyone else, the worker should explain that they will need to speak with the DSL/Prevent Lead, who will have greater expertise in dealing with the issue at hand.

#### **STAGE 2 – THE SAFEGUARDING TEAM**

The duty of the DSL/Prevent Lead on receiving a report is to review the concern that they have received and report (within 24 hours) the concern on to the appropriate people, where necessary.

The DSL/Prevent Lead will discuss the concerns, together with any other information already received, with one or both deputy DSL/Prevent Leads and together they will decide which of the following actions should follow:

- **Pastoral issue** – no perceived current need to continue considering the matter as a safeguarding/Prevent issue (no evident risk), refer the person to the Pastoral tutor to provide support;
- **Possible Safeguarding/child protection issue** – where it is thought that a child or adult is at risk of harm (or has been harmed) then the DSL/Prevent Lead will seek advice (within 24 hours) from Herts Social Care before proceeding further;
- **Possible Prevent issue** – where it is thought that the person is at risk of being radicalised or drawn into terrorism the DSL/Prevent Lead will seek advice from Prevent partners (within 24 hours) (including police and regional coordinator) before proceeding further.

In reviewing a report that is received, the DSL/Prevent Lead (and/or deputy)

- should take into account their level of experience and expertise in assessing risk to children or adults at risk.
- must take into account any other reports that have been received concerning the same individual or family.
- may speak with others in the College, where appropriate, who may have relevant information and knowledge that would impact on any decision being made. Such conversations should not lead to undue delay in taking any necessary action.
- may consult with other agencies (e.g. social services and local Prevent partners) to seek guidance and advice in knowing how to respond appropriately to the concerns that have been raised.

### STAGE 3 – THE NEXT STEPS

Where advice has been sought from external partners, the DSL/Prevent Lead (together with the Safeguarding team) will take action as follows in accordance with the advice received and the College Responding to Concerns (section 3.2.4) (figure 1):

**1) Received advice is that a referral is NOT required:** The DSL/Prevent Lead will:

- refer the child or adult to the Pastoral Care tutor if there is insufficient evidence to suggest that they are at risk of being harmed or radicalised, asking for appropriate continued observation and support for all those involved. On the advice received from Social Care, inform a child's parents under certain circumstances, where doing so would not present any further risk of harm.

**2) Received advice is that a referral IS required:** Within 24 hours of receiving the advice, the DSL/Prevent Lead will:

- Report concerns to Herts Social Care that a **child is at risk of harm** by calling 0300 123 4043, or
- Report concerns to Herts Social Care that an **adult is at risk of harm** by calling 0300 123 4042, or
- Report concerns to the police that a person is at **risk of radicalisation or being drawn into terrorism** by calling 101 and asking for the Prevent team.

Following a referral to Social Care the College will contribute, as requested by the local authority, to any statutory investigation that a Social Worker initiates in respect of a child or adult at risk. This may involve the provision of further information or attendance at an initial strategy discussion, case

conferences and on-going support as part of a core-group providing support for the child and their family or an adult at risk.

With adults at risk, confidentiality means that someone's personal business is not discussed with others, except with their permission. This is not always possible when considering passing relevant information about abuse or concerns to the statutory authorities, however, it is possible to keep the information confidential to the relevant parties. This means not telling or hinting to others what has been disclosed, not even for prayer ministry purposes. For adults at risk, concerns will only be referred to the police or Social Services without consent where:

- there is a risk of harm to others
- in order to prevent a crime

At all stages of any process, the College continues to have a responsibility to offer support to all those who have been affected, including: victims; alleged perpetrators; children; adults at risk; other family members; College workers; College Safeguarding Team; Leadership Team. Support for all those involved will be coordinated by the Pastoral Tutor and/or the College Principal/CEO.

The effectiveness of the procedures, decisions and outcomes for all those involved will be kept under review and will form part of the DSL/Prevent Lead's annual report for the Board of Trustees.



## **RESPONDING TO ALLEGATIONS OF ABUSE AGAINST A MEMBER OF THE COLLEGE COMMUNITY**

All allegations of abuse in whatever form it takes by any member of the College community will be taken very seriously. All allegations will be investigated using either the College's Staff Disciplinary Procedure or the College's [Student Disciplinary Policy](#) and Procedure. If the outcome of the investigation were to find an allegation to be true, this would amount to gross misconduct and could lead to dismissal without notice (staff) or termination of registration (student) according to the terms of the Staff Disciplinary Procedure or the College Student Disciplinary Policy and Procedures.

Use of the Staff Disciplinary Procedures does not affect an employee's right to make a claim to an employment tribunal within three months of them being found guilty of such a misdemeanour. All parties involved in a complaint (including any witnesses who may be interviewed as part of any investigation) should maintain the confidentiality of the process. Failure on the part of any member of College staff to do so will be regarded as a failure to fulfil the responsibilities of their position. All steps will be taken to maintain confidentiality as far as is consistent with progressing the complaint. Those involved in advising complainants, where possible, should seek the consent of the individual for the onward disclosure of relevant information to those with a clear need to know. Where such consent is not forthcoming, the person entrusted with the information should make it clear that, in exceptional circumstances, it may be necessary to disclose the information, taking account of the duty of care that may be owed to the individual and/or others.

If an allegation is made against someone who works with children the allegation should be reported to the College Principal/CEO (or Vice Principal (Academic)) who in turn will seek advice from the Herts Local Authority Designated Officer (LADO) within 24 hours of receiving the allegation.

The LADO is located within the Herts Safeguarding Children Partnership and should be alerted to all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The College Principal/CEO will follow the guidance of the LADO in taking action in response to the allegations.

If an allegation is made against someone who works with adults, it should be reported to the Principal/CEO and/or the police or Adult Social Services directly.

If a worker has an allegation made against them, they should step down from all College duties until the incident has been investigated by the statutory authorities.

When a criminal offence may have been committed, the relevant disciplinary procedure may not be appropriate. These cases will include, but not be limited to, serious assault or threat of serious assault.

If a complainant is deemed to have known or to have reasonably been expected to know that a complaint was unfounded, the allegation of abuse may be judged vexatious or malicious, and disciplinary action may be taken against them. This would be dealt with by the [Student Disciplinary Policy](#) and Procedure in the case of a student and the Staff disciplinary procedure (staff handbook) in the case of a member of staff. No action will be taken if a complaint, which proves to be unfounded, is judged to have been made in good faith.

## **REPORTING, RECORD KEEPING AND DATA PROTECTION**

Whenever a formal referral is made to the police, Herts Safeguarding Children Partnership, Herts Safeguarding Adults Board, Channel or LADO, the DSL/Prevent Lead or College Principal should report the referral to:

- The Safeguarding Trustee
- The Chair of the Board of Trustees
- The Principal/CEO (if not already aware)

Safeguarding records are kept electronically on MyConcern<sup>®</sup>. Historic safeguarding records are kept electronically on the College server by the DSL/Prevent Lead in a password protected file.. The retention period for safeguarding records (in accordance with the College Data Disposal Schedule) is as follows:

- Children – date of birth + 25 years
- Adults at risk – date of incident + 25 years
- Allegations against workers – 10 years or until the age of 75 (whichever is the longer)

All such records are kept in accordance with the Data Protection Act 2018. See All Nations Christian College [Data Protection Policy](#) for details; this includes an outline of data subjects' rights regarding the processing of their data.

The Board of Trustees receive a summary report of any safeguarding and Prevent incidents (anonymised) that have occurred and how they have been managed as part of the annual review of the College's safeguarding policy.

If a College worker has been accused of causing harm to a child or adult at risk this would be classed as a serious incident and should be reported to the Charity Commission.

If a worker has been removed from their post or would have been removed from their post because of the risk of harm that they pose to children or adults at risk, there is also a statutory duty to report the incident to the Disclosure and Barring Service (DBS).

## 8. APPENDIX 3 – SAFEGUARDING INCIDENT FORM

*This form should be completed and given to the Designated Safeguarding Lead without delay*

### INDIVIDUAL OF CONCERN - CONTACT DETAILS

Name

Date of birth or age (if known)

Type of suspected abuse    Physical / Emotional / Sexual / Neglect

Other (please specify)

### THE INCIDENT / CONCERN

What happened? (Nature of concern / disclosure made - use the person's own words if known)

When did it happen? (date, time)

Where did it happen? (specific location)

Who was allegedly involved and in what way? (includes witnesses)

<b>Name of member of Safeguarding team receiving this form.</b>	
<b>Date and time form received.</b>	

<b>Name of concerned person or to whom disclosure was given</b>	
<b>Contact details of concerned person or whom disclosure was given</b>	

**ANY ACTION THAT HAS BEEN TAKEN**

Have the carers or parents / guardians been informed?  
 (Please tick)  
 If so, when and by whom?

Yes	No	
-----	----	--

.....  
 .....

Have the statutory authorities been informed?  
 If so, please complete the table:

Yes	No	
-----	----	--

*Example:*

Authority	Police		
Name	Bobby		
Position	Child abuse officer		
Email contact	bobby@police.com		
Phone contact	077999		
Contacted by	DSL		
Date & time of contact	1.30pm 1/4/15		
Summary of advice received			

**FUTURE ACTION TO BE TAKEN OR OTHER ACTIONS TAKEN (include who is responsible/involved, information sharing (inc any consent, what has been shared and with whom), dates, times and outcomes)**

.....  
 .....  
 .....  
 .....  
 .....

**CHILD / ADULT PROTECTION REGISTER**

Child / Adult added to the College's Protection Register? NO / YES (Reference No: )

**MONITORING AND REVIEW (to be completed, signed and dated by the DSL)**

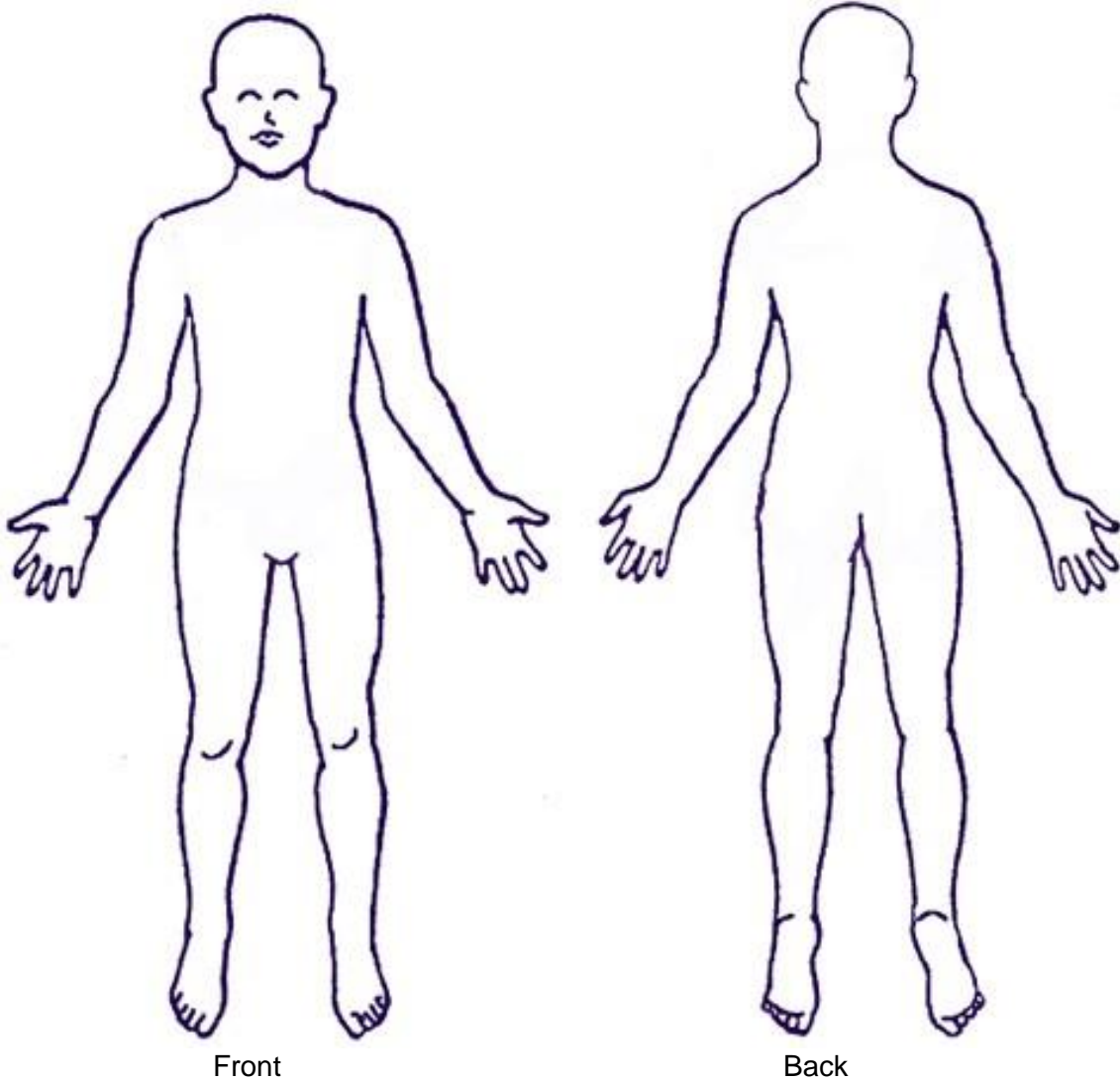
**Monitoring period (include end date)**  
**End of monitoring period review**  
**(To be completed on the end date)**

## BODY MAP

Name of Individual of concern \_\_\_\_\_

Name of person completing this form \_\_\_\_\_

These diagrams are designed for the recording of any observable bodily injuries that may appear on the person. Where bruises, burns, cuts, or other injuries occur, shade and label them clearly on the diagram. **Remember it's not your job to investigate or to decide if an injury or mark is non-accidental. Listen, observe and pass it on.**



Signature \_\_\_\_\_

Date and time \_\_\_\_\_

## 9. APPENDIX 4 - SAFEGUARDING MONITORING FORM

Number of concerns raised at College since last meeting	
If a concern has been raised: Nature of concern in general terms (for confidentiality's sake specific information is on a need to know basis only)	Date concern raised:
Action taken:	
Future action expected:	
Any action to be considered to mitigate future risk?	
Any staff training to be implemented?	
<p>Is the Board satisfied the College is fully compliant with safeguarding legislation? YES/NO</p> <p>If NO, outline a plan for addressing any noted short-comings to include action to be taken, success criteria, who is to be responsible for making these changes and an anticipated completion date</p>	

Signed Chair of Board of Trustees: .....

Name: ..... Date: .....



# 11. APPENDIX 6 - PREVENT DUTY MONITORING FORM

Number of concerns raised at College since last meeting	
Action to mitigate future risk	
Number of people considered for referral to the Channel Programme	
Number of people referred to the Channel programme	
Number of people accepted onto the Channel programme	
Number of Event organisers referred to the Board of Trustees	
Number of Speakers referred to the Board of Trustees	
Staff Training which has taken place since last meeting (staff member and type of training):	
Annual Reporting to OFS:	
<p>Is the Board satisfied the College is fully compliant with the Counter-Terrorism and Security Act 2015 <span style="float: right;">YES / NO</span></p> <p>If NO, outline a plan for addressing any noted short-comings to include action to be taken, success criteria, who is to be responsible for making these changes and an anticipated completion date</p>	

Signed Chair of Board of Trustees .....

Name: ..... Date: .....



## 12. APPENDIX 7 - CHANNEL REFERRAL FORM

Name of Subject:		DOB:
Guardian:		Relationship:
Ethnicity:	Place of Birth:	Religion:
Address		Referral Date
Telephone number		
Author	Organisation	
Contact Details		
<p>This form is to help you refer concerns to CHANNEL, regarding an individual who may be vulnerable to being drawn into terrorism. On the reverse are questions which may assist in helping you quantify and structure your concerns in order to better record them below. They are intended as a guide to help communicate your professional judgement about what has led you to make this referral. Completed forms should be sent to the Channel team.</p>		
<p>What is the behaviour / occurrence that has led you to make this referral</p>		
<b>Assessment</b>	<b>Comment / Evidence</b>	
Faith / Ideology*		
Personal / emotional & Social*		
Risk / Protective factors*		
Desire for change*		

\*See notes on next page

## **From what you know of the referral:**

### **Faith / ideology**

Are they new to a particular faith / faith strand? What was the context of their conversion?

Do they seem to have naïve, narrow or limited religious / political knowledge?

Are there concerns about a highly inconsistent vocalisation / practicing of their faith?

Have there been sudden changes in their observance, behaviour, interaction or attendance at their place of worship / organised meeting?

Have there been specific examples or is there an undertone of “Them and Us “ language or violent rhetoric being used or behaviour occurring?

Is there evidence of increasing association with a closed tight knit group of individuals / known recruiters/extremists / restricted events?

Are there particular grievances either personal or global that appear to be unresolved / festering?

Has there been an increase in unusual or sudden travel abroad without satisfactory explanation?

### **Personal / emotional / social issues**

Are there concerns over conflict with their families regarding religious beliefs / lifestyle choices?

Is there evidence of cultural anxiety and / or isolation linked to insularity / lack of integration?

Is there evidence of increasing isolation from family, friends or groups towards a smaller group of individuals or a known location?

Is there history in petty criminality and / or unusual hedonistic behaviour (alcohol/drug use, casual sexual relationships, and addictive behaviours)?

Have they got / had extremist propaganda materials (DVD's, CD's, leaflets etc.) in their possession?

Do they associate with negative / criminal peers or known groups of concern?

Are there concerns regarding their emotional stability and or mental health?

Is there evidence of participation in survivalist / combat simulation activities, e.g. paint balling?

### **Risk / Protective Factors**

What are the specific factors that are contributing towards making the referral more vulnerable to radicalisation by others or moving towards violent extremism? E.g; mental health, language barriers, cultural anxiety, impressionability, criminality, specific grievance etc.

Is there any evidence of others targeting or exploiting these vulnerabilities or risks?

What factors are there already in place or could be developed to firm up support for the referral or help them increase their resilience to negative influences? E.g. positive family ties, employment, mentor / agency input etc.

### **Desire for change**

Do they have the ability to change with / without support? Why / Why not?

How motivated are they to make steps towards changing their attitudes and behaviour?

How sustainable do you think their motivation / desire is?

### **13. REPORTING TO THE OFFICE FOR STUDENTS (OfS)**

**The OfS should be informed of:**

- Any changes to core policies which the OfS has previously assessed (such as significant change to an information technology policy as it relates to Prevent)
- Any significant changes of circumstance affecting the College's Prevent responsibilities (such as a change in Prevent lead).
- any incidents or other developments which have led to the review of and substantive revisions to broader Prevent policies
- potential reputational damage, such as media coverage
- physical harm, for instance to staff or students
- any incidents that can or do create widespread concern which may result in a loss of confidence in the sector or OfS as monitor.

**The OfS do not need to be notified of:**

- referrals to the Channel programme (unless the circumstances surrounding the concern or the referral are extraordinary and may impact upon the reputation of the sector or the institution)
- events that have not reached internal escalation thresholds, or other routine Prevent-related activity.

**The OfS will receive an annual Prevent report on request.**