

RNC Policy: Safeguarding Vulnerable Adults Policy and Procedure

Responsibility:	Residential Manager and Head of Safeguarding		
Approved by SMT:	February 2019		
Date of next review:	February 2020		
EIA Completed:	June 2017		
Other relevant Policies and reference documents: Safeguarding Children Policy Prevent Strategy and Duty Equality, Diversity and Inclusion Policy Acceptable Use Policy BYOD Policy E-Safety Policy Recruitment & Selection Policy DBS Policy Student Anti-Bullying & Harassment Policy Whistle Blowing Policy Missing Student Policy Student Substance Misuse Policy			
Version	Date	Amendments	Author
1.0	02/17	SMT approved	JP
1.1	26/02/18	Draft Annual review, minor amendment to wording, reorganisation of appendices, document accessibility addressed.	MKJ
1.2	12/03/18	Approved at SMT	MKJ
1.3	October 2018 February 2019	Reviewed. Links and contact numbers checked/updated. 2.1 – additional detail added to content of Safeguarding Induction 2.12 – addition regarding annual safeguarding audit Appendix 6 – updated Minor wording and layout changes. Approved by SMT panel.	MKJ

Commitment Statement

RNC is committed to the fundamental values of equality, diversity and inclusion, which creates a supportive environment for all members of our community to live, work and study. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and to eliminate discrimination to other equality groups related to age, sexual orientation, gender identity, marital or civil partnership

status, pregnancy or maternity and religion or belief. We believe that safeguarding has paramount importance and RNC recognises its responsibility and duties within the Government Prevent Strategy to be aware of and where appropriate act to ensure the safety of all students from radicalisation and extremism.

This document is available in alternative formats on request. If you think RNC can improve the fairness of this policy please contact the author who has responsibility for the review and update

Contents

Safeguarding Policy	3
1. What staff should do if they have concerns about safeguarding practices within the College?.....	3
2. Raising Safeguarding Awareness and Continuing Professional Development (CPD)	4
Procedures	5
3. Staff Named Person.....	5
4. Vetting process for staff, governors and volunteers	5
5. Responding to Protection Allegations or concerns.....	6
6. Procedures for Designated Safeguarding Officer.....	7
7. Allegations of Abuse of Students by Staff or Volunteers	8
8. Internal Case Review	9
9. External Work Placements for all students.....	10
10. Work Placements at RNC	11

The term ‘Student’ is used throughout this policy and should be interpreted as being inclusive of SES customers, younger funded students over the age of 18 and any other participants of training activity over the age of 18 that takes place at the college.

Safeguarding Policy

For a Definition of Terms and Acronyms contained within this policy please reference Appendix 1

All staff at RNC share an objective to help keep young people and vulnerable adults safe. We believe that the safeguarding of all RNC students has paramount importance and we have a zero tolerance of abuse and other harmful behaviour. RNC recognises its responsibility to prevent unsuitable people working with vulnerable adults and is committed to ensuring safer recruitment of staff and volunteers. In line with the Counter-Terrorism and Security Act 2015, RNC recognises its responsibility within the Prevent Duty to be aware of and, where appropriate, act to ensure the safety of all students from radicalisation and extremism.

We believe in creating a supportive environment that enables students to be able to speak out and that staff should be empowered to promote safe practice and challenge poor and unsafe practice.

We are committed to working with other local colleges, the Herefordshire Safeguarding Adults Board (HSAB) and their guidance, and other health and social care partnerships, and accept our responsibility to apply procedures for addressing any breach. Our policies and procedures for safeguarding adults are aligned with the West Midlands Adult Safeguarding Policy and Procedures (2016). Refer to the link below:

[Herefordshire Safeguarding Adults Board - Herefordshire Safeguarding](#)

RNC is committed to safeguarding adults under the guidance given in the 2014 Care Act. This summarises our duties as: 'Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect.

It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time 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. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.'

1. What staff should do if they have concerns about safeguarding practices within the College?

1.1 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College Safeguarding Policy and Procedures and know that such concerns will be taken seriously by SMT.

1.2 Appropriate whistleblowing procedures are in place for such concerns to be raised with SMT.

1.3 Where a staff member feels unable to raise an issue with SMT or feels that their genuine concerns are not being addressed, they should contact the Safeguarding Governor.

1.4 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection internally. Staff can call 0800 028 0285 – line is

available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

2. Raising Safeguarding Awareness and Continuing Professional Development (CPD)

2.1 All new staff members receive a safeguarding Induction from a DSO within the first week of employment. The induction includes ensuring new staff are aware of the identity of the LDSO and designated deputies, and the requirement for staff to sign an agreement that they have read and understood the following documents:

Safeguarding Vulnerable Adults Policy

Safeguarding Children Policy

Guidance to Safer Working Practices for staff who work with Children and Young People
Keeping Children Safe in Education – Part 1 (KCSIE)

2.2 All staff are required to attend safeguarding training in line with national and local standards at least once every three years. New staff members who are student-facing must have attended this training within three months of commencement of employment.

2.3 All new staff members are required to complete the Home Office online Workshop to Raise Awareness of Prevent (WRAP) training within the first month of employment. Face to face training is provided to staff that cannot access the online WRAP training.

2.4 All staff members are required to attend face to face approved Home Office WRAP training within the first three months of employment and thereafter every three years.

2.5 All volunteers are required to attend a Safeguarding Induction from a DSO. Volunteers who are student-facing and therefore considered to be in regulated activity must also attend safeguarding training in line with national and local standards at least once every three years.

2.6 All RNC staff receive an annual mandatory safeguarding update at the start of each autumn term. Staff are required to read the update in full, including any linked documents, and advise the Director of Student Support Services once they have done so. Staff who are on long term absence leave receive a briefing on their return to work.

2.7 Two further updates are provided to staff during the spring and summer terms via an all-staff email. Hard copies are made available for teams who do not routinely access email. The updates advise staff of College policy and procedures, how to recognise potentially abusive situations, how to report, and how the College is linked to external safeguarding authorities.

2.8 The DSO team ensure that up to date flow charts are displayed in prominent positions around College informing all students, staff and volunteers of the procedures for reporting safeguarding allegations or concerns (Appendix 2).

2.9 The Residential Managers advise new students of the RNC Safeguarding Policy as part of their induction to College.

2.10 A representative cross-College Safeguarding Panel meets half-termly to ensure that safeguarding is embedded within all organisational activities.

2.11 Safeguarding is a standing agenda item on Senior Management Team (SMT), College Managers Group, Teacher in Charge and Residential Managers' meetings, and all

residential department meetings.

2.12 A member of SMT will undertake an annual safeguarding audit to assure policy and procedure is embedded throughout the organisation and to inform areas for improvement. The Safeguarding Committee will review the findings and, if required, develop an action plan. The audit and action plan may be shared with local authorities on request.

Procedures

3. Staff Named Person

3.1 RNC is required to ensure that a nominated senior member of staff holds a management responsibility for safeguarding arrangements at the College. The 'Named Person' will liaise with the social services and other relevant agencies on safeguarding issues on behalf of the organisation. At RNC the Named Person is referred to as the Lead Designated Safeguarding Officer (LDSO); in their absence any member of the Designated Safeguarding Officer (DSO) Team will hold this responsibility.

3.2 RNC senior managers with responsibility for safeguarding are listed in Appendix 6.

4. Vetting process for staff, governors and volunteers

4.1 The RNC campus comprises of all College learning areas, halls of residences and their surrounding grounds. All College staff and volunteers may be required to work unsupervised in a regulated activity (work that a person barred from working with vulnerable people/children must not do) and as such are subject to enhanced Disclosure and Barring Service (DBS) checks in addition to standard vetting checks. The DBS is renewed for all staff every three years.

4.2 Within the recruitment stage, if a 'positive' DBS is received, action is taken in line with the College DBS Policy to determine the suitability of the candidate's employment.

4.3 At renewal stage for existing staff, action is taken in line with the College DBS Policy to determine the continued suitability for employment.

4.4 Any staff who have not received an enhanced DBS is not permitted to work on the College campus unsupervised and without an appropriate risk assessment being in place and on file with the Human Resources (HR) department.

4.5 For all regulated activity RNC HR staff check applicant identity against the official documents required for the DBS application. This requires them to have sight of three separate official documents for each member of staff.

4.6 RNC HR staff store evidence of vetting checks on the College MIS and Single Central Record.

4.7 Reference request letters specifically ask for information relating to any known reason why the person should not be employed to work with young people or vulnerable adults. The letter also includes the statement 'there should be no material mis-statement or omission relevant to the suitability of the applicant'.

4.8 There is always direct contact by the RNC HR team or recruiting manager with the referees to verify the references.

3.9 Written records of interviews are stored on successful applicants' employee files, and unsuccessful applicants' interview sheets are stored for six months.

4.10 Essential qualifications are routinely checked for every successful applicant. The requirement for a full employment history is made clear on the RNC application form and any gaps are discussed at interview stage.

4.11 RNC ensures the reference contact provided is appropriate to the role applied for and checks the reasons previous employment ended.

4.12 SMT undertakes quarterly internal audits of staff files (two files from each directorate) to check that the above measures are routinely and robustly implemented.

5. Responding to Protection Allegations or concerns.

Quick reference Action Guidelines for Staff Receiving Disclosure/Suspicion can be found in Appendix 3.

5.1 Any member of staff or volunteer who is told of any incident or the strong suspicion of abuse of a student occurring in the College, or to a student of the College at home or outside the College, must report the information the same day to a DSO. The Principal must be informed immediately and kept informed of all decisions, actions and outcomes.

5.2 If the allegation or suspicion is about a member of staff or a volunteer refer to the guidance in Section 7 of this policy.

5.3 No member of staff should investigate reports of physical or sexual abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved must not be interviewed by College staff beyond the point at which it is clear that there is an allegation.

5.4 Any staff member to whom an allegation of abuse is made must:

- Limit any questioning to the minimum necessary to seek clarification, strictly avoiding 'leading' the person who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- Stop asking any more questions as soon as the individual has disclosed that they believe that something abusive has happened to them or to someone else.
- With the knowledge of the individual concerned (and, where appropriate, their consent) refer the matter immediately, with all relevant details, to a DSO.

5.5 Staff members must never give absolute guarantees of confidentiality to students or other staff members wishing to tell them something serious. However, they should guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken. They should guarantee that they will not tell anyone who does not have a clear need to know, and that confidentiality will be respected within the designated team.

5.6 The informing or disclosing student or staff member should be assured of safeguarding from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

5.7 Dealing with disclosures or allegations can be upsetting for individuals. The DSO Team are available to meet with staff to provide debrief and support.

6. Procedures for Designated Safeguarding Officer

The DSO, on receiving an allegation or concern of a safeguarding nature will:

6.1 Meet with the student and seek clarification of the report or disclosure.

6.2 Ask the informing student what steps they would like taken to protect them now that they have made an allegation, and assure them that the College will try to follow their wishes.

6.3 Take any steps needed to protect any student involved from risk of immediate harm whilst remaining aware of the possibility of forensic evidence.

6.4 Start a confidential Safeguarding Incident Log (Appendix 4); this timeline of contact and actions will be maintained throughout the reported case. A copy of this log must be available to the Principal and be available for inspection purposes if required by the Lead Inspector or other agency representatives.

6.5 If the nature of the allegation or disclosure is that there is potential that a crime has been committed, the DSO will inform the Principal. The DSO will not investigate the allegation further.

6.6 If the student is considered a vulnerable adult, a Safeguarding Adults Concern Form (AP1), accessible to the DSO Team from HSAB, will be completed and the DSO will refer the matter without delay to the Safeguarding Adults Advice and Referral Team and the Police. In some circumstances an AP1 will be sent to Adult Social Care Team in the student's home area.

The Safeguarding Adults Advice and Referral Team is contactable on:

Tel: 01432 260 715 (Available weekdays 9am-5pm)

0330 123 9309 (after 5pm, weekends and public holidays)

E-mail: safeguarding@herefordshire.gcsx.gov.uk

Police 0300 333 3000

6.7 The DSO will follow the advice from the Police and/or Safeguarding Adult Advice and Referral Team on any necessary next steps in relation to:

- informing a student's parents/guardians/carers
- medical examination or treatment of the student
- immediate safeguarding measures that may be needed for a student who has been the victim of abuse, a student who has given information about abuse, or a student about whom an allegation has been made
- referral to other appropriate agencies, for example the Forced Marriages Unit

6.8 The DSO will inform the student and/or the person who made the initial allegation of

what the next steps are to be, having been advised of these by the Police or the Safeguarding Adults Advice and Referral Team or other relevant agency.

6.9 The DSO will take any necessary steps for the longer-term safeguarding and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking their wishes into account.

6.10 The DSO will take any necessary steps to protect and support a student who is alleged to have abused another.

6.11 The DSO will ensure that any student being interviewed by the Police has a supportive member of staff (appropriate adult) of their choice from within available staff resources to accompany them if this becomes necessary.

6.12 The DSO will ensure the notification of external bodies such as the sponsoring authority.

6.13 The DSO will ensure the cooperation by the College in any subsequent investigation by the Safeguarding Adult Advice and Referral Team, Police or other relevant agency.

6.14 The DSO will oversee arrangements, where feasible, for any student who has been the subject of abuse to receive any necessary continuing counselling and support.

7. Allegations of Abuse of Students by Staff or Volunteers

7.1 All allegations of abuse of students by staff or volunteers are taken seriously and treated in accordance with the local safeguarding procedures and national guidance. These procedures are used in respect of all cases in which it is alleged that a member of staff or a volunteer at RNC has:

- behaved in a way that has (or may have) harmed a student or students
- possibly committed a criminal offence against or related to a student or students, or
- behaved towards a student or students in a way that indicates they are unsuitable to work with vulnerable groups.

7.2 Where allegations of abuse are made against a member of staff or volunteer the DSO will notify the Director of Student Support Services and/or Principal immediately. In cases where members of the DSO Team are the subject of the allegation, any staff member receiving the allegation must pass on the allegation directly to the Principal or in his absence the Charity Chief Executive.

7.3 In cases where the Principal or Charity Chief Executive (CCE) is the subject of the allegation the RNC Lead Designated Officer will contact the Designated Governor (see Appendix 1).

7.4 The senior member of staff or Governor assigned to oversee the allegations will report without delay to the Safeguarding Adults Advice and Referral team (Refer to 7.6 for contact details).

7.5 The Safeguarding Adults Advice and Referral team will advise on three strands in the consideration of an allegation:

- a Police investigation of a possible criminal offence
- enquiries and assessment by the Safeguarding Adults Advice and Referral team about whether the student is in need of protection
- consideration of disciplinary action in respect of the individual, which includes guidance for suspending a member of staff/volunteer.

7.6 The Principal or member of SMT, if necessary and following advice from the Safeguarding Adults Advice and Referral team, will suspend from duty, pending investigation, any member of staff who is alleged to have abused a student or students.

7.7 RNC's HR department will ensure that the person who is the subject of the allegation is informed of the progress of the case.

7.8 RNC will ensure that every effort is made to maintain confidentiality and guard against unwanted publicity.

7.9 RNC will ensure that any allegation will be followed through, regardless of whether the subject of the allegation chooses to resign or cease to provide their services.

7.10 RNC will not enter into compromise agreements (by which the person agrees to resign, the College agrees not to pursue disciplinary action and both parties agree a form of words to be used in a reference) in relation to any allegations of abuse.

7.11 RNC will work under the direction of the Safeguarding Adults Advice and Referral Team and engage fully with strategy discussions and information sharing protocols

7.12 If an allegation is substantiated RNC will ensure that DBS are notified, usually via the Local Authority Designated Officer (LADO).

7.13 If the investigation concludes that the person who has been suspended can return to work RNC will consider how best to facilitate this, which will include consideration of supportive measure to deal with stress issues.

7.14 If an allegation is determined to be false the Safeguarding Adults Advice and Referral Team should refer the matter to the appropriate team to determine whether the person concerned is in need of services or may have been abused by someone else.

7.15 In a case where the LADO or the Police provides information to the College in regard to a criminal conviction or a member of staff being on the barred list actions will be taken in line with the College DBS Policy.

7.16 At the conclusion of each case SMT and Governors will consider the lessons of the case and how they should be acted upon.

8. Internal Case Review

8.1 In all cases where there has been a requirement to make a report to the Police an internal case review will be held.

8.2 A minimum of two members of SMT will meet with the Director of Student Support Services and relevant members of the DSO Team.

8.3 The relevant DSO will provide a full written report to the identified members of SMT

which will include all activity, decision making rationale and actions as detailed in the Safeguarding Log, no later than five days prior to the date of the review meeting.

8.4 The intended purpose of the case review is to provide a vehicle for reflection, identify good practice, provide challenge where required in relation to decision making, and to make recommendations for changes to procedure and policy as appropriate.

8.5 The outcome and any recommendations will be reported to SMT and the College Safeguarding Committee.

9. External Work Placements for all students

9.1 Responsibility for the students' welfare always remains with the College.

9.2 The College has a Work Placement Co-ordinator who has received Safeguarding training.

9.3 The Work Placement Co-ordinator is responsible for organising and confirming that a pre-placement visit is undertaken to ensure the suitability of the placement and of the student for the placement.

9.4 Transportation for work placements arranged by the College is always with approved taxi companies whose drivers have enhanced DBS in place.

9.5 The Work Placement Co-ordinator will put in place reporting systems for the student and employer.

9.6 The Work Placement Co-ordinator is responsible for agreeing with the student and employer a monitoring process for the duration of the placement.

9.7 The Work Placement Co-ordinator is responsible for providing a Placement Safeguarding Briefing sheet for the student and employer which clarifies safeguarding responsibilities and who to contact in the event of any concerns.

9.8 The Work Placement Co-ordinator will ensure that the employer appoints a Placement Supervisor. The Supervisor will be required to sign their understanding and agreement to work within the guidance stated within the Placement Safeguarding Briefing which is in line with RNC Safeguarding Policies and Procedures.

9.9 Enhanced DBS checks are not required for short-term placements i.e. half day/full day a week if lasting one term or block placements of up to three weeks.

The above steps should be taken in relation to all work placements.

9.10 Long term placements require the Placement Supervisor to receive a safeguarding briefing and undergo an enhanced DBS check.

9.11 The LDSO must be consulted when consideration is given to a work placement with a sole trader, where travel is required as part of the placement, or if there is a residential component required.

10. Work Placements at RNC

10.1 Requests for work placements at RNC from external bodies or individuals should be referred to:

- LDSO for placements within Student Support Services and the Learning Directorate (with the exception of Mobility placements)
- Teacher in Charge of Skills for Life for Mobility placements
- Commercial Manager for placements within commercial areas of the College
- Charity Chief Executive for placements with Marketing and Fundraising
- Director of Finance and Resources for placements with Finance, HR and Estates

10.2 The HR Department should be informed of all placement requests to enable them to track procedural compliance.

10.3 The TiC or manager for the area where the placement is requested will decide on the suitability of the placement.

10.4 RNC will appoint a Placement Supervisor who will meet with the school/college who made the request for the placement to agree expectations.

10.5 Individuals requesting a work placement will be required to provide an Enhanced DBS or have an appropriate risk assessment in place and filed with HR.

10.6 The RNC Placement Supervisor will ensure that the Placement Organiser and individual on placement receive the RNC briefing sheet (Appendix 5).

10.7 The Placement Supervisor will provide the HR department with a signed copy of the briefing sheet (Appendix 5).

10.8 The Placement Supervisor will be responsible for ensuring compliance with expectations set out in Appendix 5 and must report any concerns without delay to their TiC or manager.