

# Safeguarding Policy and Procedures

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<sup>1</sup> This date is only indicative, and the said policy may be reviewed before due to changes in the macro and/or micro environment.

# Safeguarding Policy and Procedures

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# Safeguarding Policy and Procedures

## 1 Scope of the policy

This policy covers the principles of course management and administrative procedures offered through Bliss College ensuring that the welfare and general interest of students are prioritized. This Policy applies to all staff (including subcontractors), academic and business support staff employed by Bliss College, temporary staff and volunteers. All have a legal responsibility to take seriously any vulnerable adult concerns that come to their attention and follow the procedures given.

Subcontractors must be informed of this Policy and deal with any concerns reported to them by contacting the Designated Person with responsibility for Vulnerable Adult Protection in Bliss College.

Students who have concerns about other students or the behaviour of adults towards them can use this policy to ensure they are taken seriously. It is not Bliss College's responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action.

## 2 Purpose of the policy

The purpose of this policy is to implement Bliss College's commitment to develop a learning environment where all applicants and students are given the opportunity to demonstrate and realize their full potential. It aims to create and embed a culture of support and equal opportunities for students with learning difficulties and disabilities.

## 3 Location of the policy

You can obtain of this policy by ringing our administration team on 02085144977.

## 4 Communication of the policy

It's important that both personnel involved in the management, assessment and quality assurance of all programs on offer, are fully aware of the contents of the policy. A note will be provided on the Centre Accreditation Form to confirm that Centre is aware of this policy and will abide by it. There is also a note on the Student Registration Form to the same effect.

## 5 Review of the policy

This policy is a live document and will evolve over time. Although the review dates are scheduled above, this may change due to feedback from stakeholders, external agencies and regulatory authorities. The review of the policy will ensure that procedures continue to be consistent with the regulatory criteria and are applied properly and fairly in arriving at judgments in promoting a fair and inclusive learning and teaching environment for all.

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## 6 Who are we safeguarding?

The Children Act 1989 states the legal definition of a child is a 'person under the age of 18'. 'Young person' is not a legal term, for the purposes of the policy and procedures, a young person is someone who might not perceive themselves as a child, but who is still in the age range of the legal definition, and therefore falls within the term 'child'.

A vulnerable adult is, as defined by TPOFA, a person aged eighteen and over, 'and who requires the provision of "regulated activity"'.

"Regulated activity" is defined as:

- Providing health care.
- Providing personal care.
- Providing social work.
- Assisting with general household matters.
- Assisting in the conduct of a person's own affairs.
- Conveying.
- Day to day management or supervision of any person engaging in the above.

Adults are not "*vulnerable*" under the provisions of the Act because of the setting in which they receive this activity or because of their own personal characteristics or circumstances. However, Bliss College recognises that it has a more general moral duty to safeguard the well-being of someone who may be disadvantaged, particularly those who are or may be "in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation" (Department of Health, 2000).

Statutory Guidance issued under the Counterterrorism and Security Act 2015 requires educational institutions to have "*due regard to the need to prevent people from being drawn into terrorism*".

Bliss College has a duty under the Guidance to help safeguard learners from being drawn into both violent and non-violent extremism.

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## SAFEGUARDING POLICY AND PROCEDURES

### Introduction

Bliss College is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults, engaged in the breadth of its activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse of children and vulnerable adults.

*“Safeguarding’, is the duty and responsibility that those providing an education service must carry out, to protect individuals from harm” - Safer Practice, Safer Learning, National Institute for Adult Continuing Education (now the Learning and work Institute).*

The Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) describe safeguarding as meaning that:

*“Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risks of harm to the individual’s welfare are minimised; and where there are concerns about children and young people’s welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.”*

The Department for Education’s statutory guidance, *“Keeping children safe in education”* defines safeguarding and promoting the welfare of as: protecting children from maltreatment; preventing impairment of children’s 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.

The Safeguarding Vulnerable Groups Act 2006 (“SVGA”) extends this legal duty to vulnerable adults. The Protection of Freedoms Act 2012 (“TPoFA”) amends some of the provisions of the 2006 Act and sets.

### Why safeguarding is necessary.

Bliss College has frequent contact with children through taster days (learners studying up to a level 3 qualification), summer schools, family classes, and other community learning opportunities. Bliss College currently recruits young learners between the ages of 16-18 as its core clientele for its study program.

From time to time, we also take pride in supporting vulnerable adults in their studies, not only by including courses specifically for adults with learning and other disabilities in our course offer, but by facilitating their participation in our main and community learning programmes.

Section 175 of the Education Act 2000, which reinforces the Children Act 1989, places a statutory duty on governing bodies of schools, colleges and training centres to promote the welfare and safety of children.

The Department for Education’s *“Keeping children safe in education”* provides statutory guidance for schools and colleges.

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The SVGA and the Further Education (Providers of Education) (England) Regulations 2006 extend this statutory duty to vulnerable adults. The SVGA as amended by TPoFA places a legal obligation on Bliss College to ensure that every person who is engaged in Regulated Activity has been assessed using data gathered by the Disclosure and Barring Service (DBS), including relevant criminal convictions, cautions, police intelligence and other appropriate sources.

Anyone who has been barred by the Disclosure and Barring Service is not permitted to be employed in Regulated Activity. The acts also place a duty on Bliss College to make referrals to the Disclosure and Barring Service in particular circumstances.

This policy will enable Bliss College to demonstrate its commitment to keeping adults safe, including the vulnerable with whom it works alongside. We acknowledge its duty to act appropriately to any allegations, reports or suspicions of abuse. It is important to have the policy and procedures in place so that staff, volunteers, service users and carers, and management committee can work to prevent abuse and know what to do in the event of abuse. The Policy Statement and Procedures have been drawn up in order to enable it to:

- Promote good practice and work in a way that can prevent harm, abuse and coercion occurring
- To ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.
- And to stop that abuse occurring.

## The Policy and Procedures is based on the following principles:

- Empowerment People being supported and encouraged to make their own decisions and informed consent.
- Prevention It is better to take action before harm occurs.
- Proportionality The least intrusive response appropriate to the risk presented.
- Protection Support and representation for those in greatest need.
- Partnership Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- Accountability and transparency in safeguarding practice.

The Policy and Procedures also relate to the safeguarding of vulnerable adults. Vulnerable adults are defined as people:

- Aged 18 or over.
- Who are receiving or may need community care services because of learning, physical or mental disability, age, or illness.
- Who are or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.  
(No Secrets, Department of Health, 2000) The policy applies to all staff, including senior managers, management committee members, trustees, paid staff, volunteers, tutors, mentors, students, suppliers, funders and anyone working on behalf of Bliss College.

This policy has been established for all the above-mentioned individuals to keep safe within and outside the institution from:

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- Accidents
- Crime
- Bullying and harassment including cyber bullying
- Maltreatment
- Domestic violence and bullying
- Financial abuse
- Discrimination abuse

Abuse – there are many categories of abuse and include areas such as physical, emotional, sexual and neglect. In addition to these you must be aware of how to identify the signs of the abuse categories outlined in Keeping Children Safe in Education 2014.

In order to implement the policy, Bliss College will work:

- to promote the freedom and dignity of the person who has or is experiencing abuse.
- to promote the rights of all people to live free from abuse and coercion.
- to ensure the safety and well-being of all individuals related to Bliss College.
- to manage services in a way which promotes safety and prevents abuse.
- recruit staff and volunteers safely, ensuring all necessary checks are made.
- provide effective management for staff and volunteers through supervision, support and training.

Bliss College:

- will ensure that all staff, including senior managers, management committee members, trustees, paid staff, volunteers, tutors, mentors, students, suppliers, funders and anyone working on behalf of Bliss College are familiar with this policy and procedures.
- will act within its confidentiality policy and will usually gain permission from service users before sharing information about them with another agency.
- will pass information to Adult and Culture Services when more than one person is at risk. For example: if the concern relates to a worker, volunteer or organization who provides a service to vulnerable adults or children.
- will inform service users that where a person is in danger, a child is at risk, or a crime has been committed then a decision may be taken to pass information to another agency without the service user's consent.
- will make a referral to the Adult Social Care Direct team as appropriate.
- will endeavour to keep up to date with national developments relating to preventing abuse and welfare of adults.
- will conduct training sessions for learners going for work placements in care homes, domiciliary care, or hospitals. The learners will be informed about their roles and responsibilities and where to seek information and advice. Before assigning the learners to any work placement Bliss College will conduct a risk assessment and review their policies and procedures.
- will ensure that the Designated Named Person understands his/her responsibility to refer incidents of adult abuse to the relevant statutory agencies (Police/Adult and Culture Services Directorate)  
The Designated Named Person for Safeguarding Adults is Shani Thomas- Director of Operations at Bliss College.

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## 2. Safeguarding Structure

Bliss College has identified an organisational structure for safeguarding vulnerable adults, with key staff having designated safeguarding responsibilities including:

Name	Position / Comment	Telephone	Email Address
Shani Thomas - Director	Overall leadership of Safeguarding	02085144977	<a href="mailto:shani.thomas@blisscollegeuk.com">shani.thomas@blisscollegeuk.com</a>
Ponnammal Fredrick-Joseph	Designated Safeguarding Officer – students related	02085144977	<a href="mailto:ponnammal@blisscollegeuk.com">ponnammal@blisscollegeuk.com</a>

## 3. Designated Named Person for safeguarding adults

The roles and responsibilities of the named person(s) are:

- to ensure that all staff including volunteers, management committee members and trustees are aware of what they should do and who they should go to if they have concerns that a vulnerable adult may be experiencing or has experienced abuse or neglect.
- to ensure that concerns are acted on, clearly recorded and referred to a Safeguarding Adults Board or to the allocated social worker/care manager where necessary.
- to follow up any referrals and ensure the issues have been addressed.
- consider any recommendations from the Safeguarding Adults process
- to reinforce the utmost need for confidentiality and to ensure that staff and volunteers are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest.
- if appropriate staff or volunteers will be given support and afforded protection, if necessary, under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and its outcome.

## 4. Responsibilities of the staff

- Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility. Everyone who comes into contact with children and vulnerable adults and their families and carers has a role to play in safeguarding them. In order to fulfil this responsibility effectively, all professionals should consider, at all times, what is in the best interests of the child or vulnerable person.
- Staff working in direct contact with children and vulnerable adults on a day-to-day basis may come across signs of harm and/or abuse. Staff must ensure that significant concerns for the wellbeing of a child or vulnerable adult are reported to the appropriate member of staff. This will invoke the appropriate procedures to protect the child or vulnerable adult, involving Social Services and/or the Police as appropriate. Where staff members are unsure and need guidance about safeguarding issues, they are encouraged to seek support from their nominated manager.

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- In the event of any concern by any member of staff, or if any member of staff is approached by a child or vulnerable adult student, regarding any matter concerning abuse, they must tell the child or student that they are bound to pass on the information to the designated person.
- The person receiving the information should pass it on as a matter of urgency to ensure the matter can be dealt with as soon as possible. If the designated person is not available, the staff member should contact a member of the Senior Management Team.
- No one must be promised that anything they say will be kept confidential if the matter is related to child or vulnerable adult protection or abuse. It is helpful for a member of staff to tell the person raising the concern they will jot down anything they actually say to ensure an exact a record as possible is kept for future reference.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Bliss College’s safeguarding practices and know that such concerns will be taken seriously by the senior management team.
- Bliss College’s whistleblowing procedures should be followed where there are such concerns.
- Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.
- General guidance can be found at <https://www.gov.uk/whistleblowing>; The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures 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](mailto:help@nspcc.org.uk).

## 5. Safeguarding Controls

- Risk assessments must be carried out for all activities involving children and vulnerable adults, and reasonable, proportionate adaptations made to those activities as a result in order to safeguard the wellbeing of such individuals.
- Bliss College reserves the right to refuse to admit a child or vulnerable adult to a programme of study, or other centre-managed activities, if we judge that the adaptations necessary to safeguard that individual’s wellbeing go beyond what is reasonable and proportionate, including measures to manage inappropriate or disruptive behaviour.
- Where children or students work or volunteer on specified activities or in specified settings, they will be subject to the relevant checks as outlined in the relevant departmental procedures.
- Where children or students, staff members or visitors are present on Centre premises, they remain the responsibility of their parent/guardian. However, this does not remove the obligations of Bliss College staff or volunteers.
- Safeguarding the wellbeing of any children visiting the Centre without their parent/guardian is the responsibility of the organiser of the activities in which the child is participating. However, nor does this remove the obligations of Centre staff or volunteers outlined in this policy document.
- Disclosure Checks: Disclosure checks will be obtained when required by the designation of work as “regulated” under TPoFA, or by the Disclosure and

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Barring Service. Bliss College will also normally undertake a disclosure check where an employee is engaged in work which was previously designated as regulated under the SVGA. Such work includes duties which involve regular contact with someone who.

- is in residential accommodation, (Section 59 (2)(a) indicates this in connection with care or nursing or a residential special school).
- is in sheltered housing.
- receives domiciliary care.
- receives any form of health care.
- is detained in lawful custody.
- is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43).
- receives a welfare service of a prescribed description, (Section 16 (5)(a) indicates this includes counselling or advice).
- receives any service or participates in any activity provided specifically for persons who has particular needs because of his age, has any form of disability or has a prescribed physical or mental problem. (Dyslexia, dyscalculia, and dyspraxia are excluded disabilities).
- receives payments (directly or via payments made to another on his behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001 (c. 15), or.
- requires assistance in the conduct of his own affairs. (Section 59 (10)(a) indicates this is where a lasting power of attorney exists).

These requirements will be reviewed annually and updated where necessary.

- a. Disclosure checks will be obtained for new starters prior to the commencement of any work where the Disclosure check is required.
- b. Bliss College will adhere to all relevant regulations and codes of practice as issued by the DBS.
- c. All information regarding Disclosure certificates will be processed by the Administrative Team and will not be passed to third parties.
- d. The Administrative Team will confirm to the relevant programme / service manager whether a satisfactory disclosure has been obtained. This information will be recorded securely on the company's database. If items appear on the Disclosure that give cause for concern, management will discuss these with the staff concerned and discuss with the applicant whether the employment can continue or whether any conditions are to be applied.

Employing a person(s) with a criminal record:

- The possession of a criminal record is not a bar to employment at Bliss College. If an offer of employment has been made that is dependent on the obtaining of a Disclosure by the successful applicant, the offer will only be withdrawn if the disclosed information is relevant to the duties of the post or the selection criteria for that post. If appropriate consideration will be given modifying the offer of employment rather than withdrawing it.
- Where a post is exempt from the Rehabilitation of Offenders Act, 1974, (where it involves working with children, the elderly or the sick) this will be identified in the job description.

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- If employment is not dependent on a Disclosure and the applicant declares convictions the offer will only be withdrawn if the conviction(s) is relevant to the duties of the post or the selection criteria for that post.

End.

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## PROCEDURE

### 1. Introduction

Bliss College provides education and training services to adults. These procedures have been designed to ensure the welfare and protection of any adult who accesses services provided by Bliss College. The procedures recognise that adult abuse can be a difficult subject for workers to deal with. Bliss College is committed to the belief that the protection of vulnerable adults from harm and abuse is everybody's responsibility, and the aim of these procedures is to ensure that all managers, trustees of the organisation, management committee members, staff and volunteers act appropriately in response to any concern around adult abuse.

### 2. Definitions of Abuse (Vulnerable Adults)

#### Physical Abuse

Physical abuse is the physical ill treatment of an adult, which may or may not cause physical injury and causes harm to the individual's person. It may involve pushing, slapping, pinching, punching, hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating, force feeding, improper administration of medicines or denial of prescribed medicines, forced isolation and confinement, including a person being locked in a room or inappropriate sanctions or restraint, or inappropriate manual handling. It may be the result of a deliberate failure to prevent injury occurring.

#### Psychological and Emotional Abuse

Psychological abuse may involve the use of harassment, bullying, intimidation, indifference, hostility, rejection, threats, humiliation, name-calling, other degrading behaviours, shouting, swearing, discrimination or the use of oppressive language, mobile phone texting abuse, email, emotional abuse and all forms of cyber abuse. It can result in feelings of low self-worth. Some level of psychological or emotional abuse is present in all forms of abuse.

#### Sexual Abuse

Sexual abuse involves a vulnerable adult participating in, or watching, sexual activity to which they have not consented or were pressured into consenting, or to which they cannot give informed consent. It is not necessary for the individual to be aware that the activity is sexual. The activities may include physical contact, including penetrative or non-penetrative acts, e.g., rape, buggery, indecent assault or inappropriate touch, incest, and situations where the perpetrator touches the abused person's body (e.g., breasts, buttocks, genital area); non-contact activities, e.g., exposing genitals to the abused person, or coercing the abused person into participating in or watching pornographic videos or photographs.

#### Neglect

Neglect is the deliberate withholding or unintentional failure to provide help or support, which is necessary for the adult to carry out activities of daily living. It also includes a failure to intervene in situations that are dangerous to the person concerned or to others, particularly when the person lacks the mental capacity to

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assess risk. Neglect may involve failing to provide adequate food, shelter and clothing; failure to ensure access to appropriate medical care or treatment; neglect of basic emotional needs.

## Financial/Material Abuse

Financial/Material Abuse is the exploitation, inappropriate use or misappropriation of a person's financial resources or property. It occurs when the individual is deprived of their own financial assets, for example, by holding money back from the individual, obtaining money by deception, or stealing money. It includes the withholding of money or the improper use of a person's money or property, usually to the disadvantage of the person to whom it belongs.

## Institutional Abuse

Institutional abuse can be defined as abuse or mistreatment by a regime as well as by individuals within any building where care is provided. Examples include lack of flexibility and choice, lack of consultation, public discussion of personal matters, inadequate or delayed responses, staff overly controlling service users' relationships and activities.

## Discriminatory Abuse

Repeated, ongoing or widespread discrimination on the grounds of age, race, disability, religion, sexual preference or gender, slurs, harassment, name-calling, breaches in civil liberties, unequal access to health or social care.

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts. People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

All adults have a right to express their sexuality. However, where there is any doubt as to a person's capacity to make informed decisions, it is essential that the concern is reported, and the necessary assessments are carried out in accordance with the Mental Capacity Act (Page 20).

## 3. Summary Procedure for Reporting Disclosures

This procedure **must** be followed whenever any member of staff hears an allegation from a child or vulnerable adult that abuse has, or may have, occurred or where there is a significant concern that a child or vulnerable adult may be abused, or where there are concerns that there has been a vocal or active expression of extremist views or behaviour:

### Receive

- What is said.
- Accept what you are told – you do not need to decide whether or not it is true.
- Listen without displaying shock or disbelief.

### Reassure

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- The person making the disclosure.
- Acknowledge their courage in telling.
- Do not promise confidentiality.
- Remind them they are not to blame – avoid criticising the alleged perpetrator.
- Do not promise that “everything will be alright now” (it might not be).

## React

- Do not delay in registering your suspicions or concerns.
- Respond to the person making the disclosure but do not interrogate.
- Avoid leading questions but ask open ended ones.
- Clarify anything you do not understand.
- Explain what you will do next, i.e., inform a Designated Person – Director, Designated Learner or Staff Officer.

## Record

- Make notes as soon as possible – during the interview if you can.
- Use Form VPPC /Appendix 7 – Vulnerable Person Protection Concern and Report Form wherever possible. Include: time, date, place, the individual’s own words – do not assume – ask, e.g., “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance.
- Cross out mistakes – do not use Tippex.
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

## Support

- Consider what support is needed for the person making the disclosure – you may need to give them a lot of your time or they may need to be referred.
- Ensure you are supported – such interviews can be extremely stressful and time consuming.
- Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

## 4. Procedure for staff dealing with suspicions or allegations of abuse to a vulnerable adult

Any suspicion, allegation or incident of abuse must be reported to the designated member of staff with responsibility for the protection of vulnerable adults as soon as possible and in any event within 2 hours.

If this is not possible, a member of the Senior Management Team must be notified. The nominated member of staff must immediately discuss the matter with the Local Authority Adult Protection Unit on:

Redbridge - 020 8708 7333 (9.00am to 5.00pm) or 020 8554 5000 (outside office hours/emergency); (NB: The Local Authority Adult Protection Unit is responsible for coordinating action in vulnerable adult cases, including liaison with police).

If it is agreed to be a Vulnerable Adult matter, a written record of the date and time of the report shall be made, and the report must include the name and position of the

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person to whom the matter is reported. The telephone report must be confirmed in writing within 24 hours. If the consent has not been gained from the vulnerable adult, the nominated member of staff should discuss with the Local Authority Adult Protection Unit what action will be taken to inform the parents / carers of the vulnerable adult and a note of that conversation should be made. The nominated member of staff must notify the Director as soon as practicable and in any event within 2 hours of the initial concern arising.

## 5. Responding to an Allegation

A full record shall be made as soon as possible on Form VAPC/Appendix 6 of the nature of the allegation and any other relevant information including:

- The date.
- The time.
- The place where the disclosure of information took place.
- The place where the alleged abuse happened.
- Your name and the names of others present.
- The name of the complainant and, where different, the name of the vulnerable adult who has allegedly been abused.
- The nature of the alleged abuse.
- A description of any injuries observed.
- The account which has been given of the allegation.

## 6. Responding to an allegation about a member of staff

Any suspicions, allegations of actual abuse of a vulnerable adult by a member of staff must be reported to the lead designated member of staff **and** the Director or Designated Officer immediately. On being notified of any such matter, the designated member of staff shall:

- **Notify** the Director, who will initiate an investigation of this incident in line with the disciplinary procedure.
- **Take** such steps as he/she considers necessary to ensure the safety of the person in question and any other person who might be at risk.
- **Report** the matter to the Adult Protection Unit on 020 8708 7333 in accordance with the procedure set out in the previous paragraph.
- **Ensure** that a report of the matter is completed by the person who reported the original concern. If the complaint is made against any member of the Senior Management Team or a designated safeguarding officer, then the person dealing with the complaint must be the Director. If the complaint is made against the Director, then the Adult Protection Unit should be immediately notified.

## 7. Detailed Guidance & Procedure for staff in dealing with instances of abuse

Bliss College recognises its legal duty to work with other agencies in safeguarding vulnerable adults and in responding to abuse or to vocal or active expressions of extremist views or behaviour. All members of staff involved with vulnerable adults (teaching and non-teaching) have a responsibility to be mindful of issues related to vulnerable adult safety and welfare and a duty to report and refer any concerns however “minor” they appear to be.

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**“ It is not the job of Bliss College staff to investigate these concerns ”**

In cases where it is deemed that a vulnerable person lacks sufficient understanding to make informed decisions about his/her own care and treatment, parents/carers have a right to be informed about any concerns about the vulnerable person’s welfare or any action taken to safeguard and promote the vulnerable adult’s welfare, providing this does not compromise the individual’s safety. Where there are possible concerns about their safety, unconditional confidentiality cannot be guaranteed and should not be offered.

Bliss College will be proactive by taking positive steps to inform students of their rights to safety and protection and the options available to express their fears or concerns:

- Information regarding safeguarding of vulnerable adults and a summary of the Centre’s policy will be included in the student handbook.
- The safeguarding policy will be made available on the Centre’s website.
- Staff most likely to encounter vulnerable adults will be provided with appropriate training.

When students make allegations about abuse or neglect, they should always be listened to, have their comments taken seriously and, where appropriate, the allegations should be investigated thoroughly.

If you suspect that a student is going to discuss abuse, either towards themselves or another, establish ‘*GROUND RULES CONCERNING CONFIDENTIALITY*’. This information must be shared with a nominated person for safeguarding vulnerable adults and possibly with a counsellor.

The designated person will then contact the Local Authority Adult Protection Unit or, in cases where Bliss College is safeguarding against people being drawn into terrorism, the Regional HE/FE Prevent Co-ordinator, in order to discuss appropriate action. The Local Authority Adult Protection Unit or Regional Prevent Coordinator is responsible for coordinating action in their respective areas of concern, including liaison with police.

Note: It is important to state that the Adult Protection Unit will need to assess the situation and would want to work with the vulnerable adult in determining what could/should happen next. They would wish to respect the vulnerable adult’s wishes and feelings provided no one is at immediate risk of harm.

If the student is fully aware of what could happen, they can:

- choose whether they want to speak now or have time to think about it.
- be as informed as possible regarding the implications of passing on this information.

If the complainer is the vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged. Leading questions must be avoided as the use of leading questions can cause problems for the subsequent investigation and any court proceedings.

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## 8. Preventing abuse

Bliss College is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within Bliss College will be treated with respect. Therefore, this policy needs to be read in conjunction with the following policies:

- Equal Rights and Diversity
- Volunteers
- Complaints
- Whistle Blowing
- Confidentiality
- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection
- Any other policies which are relevant that the organisation has in place (e.g., Challenging Behaviour, Handling Money)

Bliss College is committed to safer recruitment policies and practices for paid staff, trustees and volunteers. This may include DBS check for staff including management committee members and volunteers, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff and volunteers.

Managing Directors and trustees will be required to provide two references and where appropriate have a Criminal Records Bureau disclosure. The organisation will work within the current legal framework for reporting staff or volunteers that are abusers. Service users will be encouraged to become involved with the running of the organisation. Information will be available about abuse and the complaints policy and Safeguarding Adults policy statement will be available to service users and their carers/families.

## 9. Duty to refer

Bliss College is under a duty to refer information to the Disclosure and Barring Service (DBS) in certain circumstances, for example, where there is a concern relating to the risk of harm to children or vulnerable adults.

*Information that is required to be referred:*

If Bliss College holds information on disciplinary proceedings related to a person engaged in regulated or controlled activity, it will be under a duty to provide the DBS with information if Bliss College 'withdraws permission for the person to engage in the activity'. Bliss College may take action to stop an employee working in regulated or controlled activity when:

- The person has committed an offence that is subject to an automatic bar, or a bar with the right to make representations.
- The person has engaged in 'relevant conduct' as defined in the Act (see below); or
- The 'harm test' is satisfied (see below).

'Relevant conduct' is:

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- Conduct which endangers or is likely to endanger a child or vulnerable adult.
- Conduct which, if repeated against or in relation to a child or vulnerable adult, would endanger or would be likely to endanger that child or vulnerable adult.
- Conduct involving sexual material relating to children (including possessing such material).
- Conduct involving sexually explicit images depicting violence against humans; and
- Conduct of a sexual nature involving a child or vulnerable adult.

The ‘harm test’ is that the person may:

- Harm a child or vulnerable adult.
- Cause a child or vulnerable adult to be harmed.
- Put a child or vulnerable adult at risk of harm.
- Attempt to harm a child or vulnerable adult; or
- Incite another to harm a child or vulnerable adult.

So, where Bliss College takes action to stop an employee working in regulated or controlled activity for any of these reasons, there will be a legal duty to refer information to the ISA. This could be a situation involving:

- Dismissal.
- A case that could have resulted in dismissal had the employee not resigned before the procedure concluded; or
- Where Bliss College stops a person working in regulated/controlled activity but continues to engage him/her in other that is neither regulated nor controlled activity.

Information that may be referred:

If Bliss College has a concern about an employee’s behaviour, they may report this to the ISA. The DBS will consider all relevant information. For example, if a disciplinary case has not been completed but the Centre suspects that the individual may pose a risk of harm, it may refer him to the DBS.

## 10. Safeguarding Individuals from being drawn into violent extremism

1. Under the Counterterrorism and Security Act 2015 the Government has issued statutory Guidance on “Prevent”, its strategy “to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions”.
2. The Guidance includes sector specific duties, and FE is one of the specified sectors. Those duties are monitored by Ofsted as part of its inspection regime.
3. It is therefore vital that all staff are aware of Bliss College’s responsibilities in this respect and are aware of what to do should they have a concern about a student or colleague who they believe may be vulnerable to being drawn into violent extremism.
4. “Prevent” duties can be viewed as a particular aspect of Bliss College’s safeguarding arrangements and as such Bliss College’s safeguarding leads also have responsibility for ensuring Bliss College meets its obligations. A risk assessment, using the template provided by the local Prevent Regional Co-

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- ordinator, has been developed and is used by Bliss College’s management teams to identify and monitor the actions required to meet these obligations.
5. The “Prevent” Strategy has a clear focus on tackling all forms of terrorism and extremism that is related to terrorism. Extremism is understood to be “vocal or active opposition to fundamental British values”, and in turn British values are defined as “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs”. Extremism also includes “calls for the death of members of our armed forces”.
  6. Where members of staff raise a concern about an individual, Bliss College safeguarding leads will consider the evidence and the circumstances and may then make a referral to the Prevent Regional Co-ordinator. The Prevent Regional Co-ordinator may then take further action under “Channel”, the Government’s “multi-agency approach to protect people at risk from radicalisation”. Channel aims to identify individuals at risk, assess the nature of that risk, develop a support plan and provide early intervention to protect and divert people away from the risk they face before any illegality occurs.
  7. Identifying those who may be vulnerable to being drawn into terrorism which may lead a member of staff to make an internal referral, may be prompted by any of the following, although it is stressed that this list is not exhaustive:
    - disclosures by students that they have been exposed to extremist actions, views, or materials of others either inside or outside of the centre.
    - graffiti, symbols, writing, or artwork promoting extremist messages or images.
    - accessing extremist material online, including through social media, chat rooms, blogs, websites.
    - unexplained changes in behaviour.
    - expressing extremist or anti-western or anti-British (“democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs) views.
    - use of extremist or “hate” terms to exclude others or incite violence.
    - intolerance of difference.
    - attempting to impose extremist views or practices on others.

In assessing individuals’ vulnerability to being drawn into terrorism regard will be given to:

- **Engagement** with a group, cause, or ideology.
- **Intent** to cause harm, and
- **Capability** to cause harm.

## 11. “Prevent” Awareness – Staff and Volunteer Development Protocol

- Bliss College acknowledges the necessity for all staff and volunteers to have an appropriate level of awareness of the Government “Prevent” strategy and to have confidence about the course of action they should follow should they encounter an issue covered by “Prevent”.
- In determining the appropriate level of staff development required for Bliss College to meet its obligations under the statutory “Prevent” guidance, a risk-based approach has been adopted. This takes account of the likelihood that a member of staff will encounter an issue covered by the “Prevent” arrangements, based on an assessment of the potential for the cohort of

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students they may have contact with to include individuals vulnerable to radicalisation.

- In addition to the requirements listed below, Bliss College will, as part of its staff development programme provide scheduled updating sessions on “Prevent” awareness which any member of staff may attend to enhance or refresh their knowledge.
- All salaried staff are required to undertake the appropriate module of the Education and Training Foundation on-line awareness training package: <http://www.preventforfeandtraining.org.uk>.
- This will form part of staff probation and satisfactory completion of the module will be a condition of passing the probation period.
- Hourly paid tutors who contribute to the Essential Skills and Access to HE programmes, ALS staff providing in-class support and volunteers providing in-class support in Essential Skills will similarly be required to undertake the appropriate ETF module.
- Hourly paid tutors and other staff and volunteers other than above will be required as a minimum to receive and note Bliss College’s “Prevent” Awareness Briefing. Signed confirmation that they have received and read it must be returned to the Administration department and compliance will be monitored through the induction check-list process.
- For new staff, the requirements above will form part of staff probation and satisfactory completion of the module will be a condition of passing the probation period. For existing staff, failure to comply with these requirements will be considered as a disciplinary matter.
- Sub-contracted and agency staff will be required to receive and note Bliss College’s “Prevent” Awareness Briefing which will be arranged in partnership with the sub-contractor or through their line manager as appropriate. Such staff will be welcome and encouraged to attend Bliss College based “Prevent” Awareness training that may be available.

## 12. Transporting a child, young person or vulnerable adult

Wherever possible it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. Members of staff and councillors can transport children, young people or vulnerable adults in the course of their duties as long as the following conditions are satisfied:

- insurance is valid and covers the use of the vehicle for business purposes.
- the vehicle is roadworthy with a valid MOT certificate.
- the child, young person or vulnerable adult wears a seat belt.
- the prior permission of the parents/guardians has been obtained.

These are the responsibility of the member of staff/councillor transporting the child, young person or vulnerable adult. If a member of staff/councillor will normally be transporting children, young people or vulnerable adults alone more than three times in a 30-day period, they must have an enhanced CRB check. The relevant head of service is responsible for ensuring this happens.

Staff members/councillors should:

- be aware that the safety and welfare of the child is their responsibility

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- report the nature of the journey, route and expected arrival time to their line manager or the relevant member of staff.
- accommodate any specific needs the child young person or vulnerable adult may have.

## 13. Disseminating/Reviewing policy and procedures

This Safeguarding Adults Policy and Procedure will be clearly communicated to all staff, including senior managers, management committee members, trustees, paid staff, volunteers, tutors, mentors, students, suppliers, funders and anyone working on behalf of Bliss College. The Designated Named Person will be responsible for ensuring that this is done. The Safeguarding Adults Policy and Procedures will be reviewed annually by the Bliss College Management Committee. The Designated Named Person for Safeguarding Adults will be involved in this process and can recommend any changes. The Designated Named Person will also ensure that any changes are clearly communicated to staff, trustees and volunteers. It may be appropriate to involve service users in the review and service users and parents/carers need to be informed of any significant changes.

## 14. Safeguarding Record Keeping

Bliss College is committed to maintaining confidentiality wherever possible and information around Safeguarding Adults issues should be shared only with those who need to know. For further information, please see Bliss College's confidentiality policy. All allegations/concerns should be recorded in the Safeguarding reporting Sheet. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate. The information that is recorded will be kept secure and will comply with data protection. This information will be secured in a locked filing cabinet in the organization. Access to this information will be restricted to the Designated Named Person.

The lead designated officer for the protection of vulnerable adults will retain the central record of all allegations and actions taken. This will include:

- The formal report on form VAPC – see Appendix 7.
- Any notes, memoranda or correspondence dealing with the matter.
- Any other relevant material.

Copies of reports, notes etc. will be kept securely locked at all times, but will be shared in accordance with the General Data Protection Regulation 2018.

## 15. Training

All staff within Bliss College, including those engaged by contracted-out services, will undergo training so that they are fully aware of this policy and their responsibilities. Designated Safeguarding Officers will receive additional training so that they can effectively fulfil their responsibilities. Staff and volunteers involved in the direct supervision of children will receive appropriate safeguarding and child protection training, which is regularly updated, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

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Bliss College has adopted a Protocol for staff development in “*Prevent*” awareness to ensure staff and volunteers are aware at a proportionate level of the risks of vulnerable individuals being radicalised

## Mental Capacity Act (MCA)

The Mental Capacity Act 2005 is a law that protects vulnerable people over the age of 16 around decision-making. The law makes it so that every adult, whatever their disability, has the right to make their own decisions wherever possible. We should always support a person to make their own decisions if they can. This might mean giving them information in a format that they can understand or explaining something in a different way. The main points in the act are:

1. To always assume the person is able to make the decision until you have proof they are not.
2. To try everything possible to support the person making the decision themselves.
3. To not assume the person does not have capacity to make a decision just because they make a decision that you think is unwise or wrong.
4. If you make a decision for someone who cannot make it themselves, the decision must always be in their best interests.
5. Any decisions, treatment or care for someone who lacks capacity must always follow the path that is the least restrictive of their basic rights and freedoms.

A person may have the capacity for some decisions but not others or they may not have the capacity now but may in the future. This means all capacity decisions should be regularly reviewed to make sure they still reflect the person's ability to make decisions.

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## 16. VULNERABLE ADULT PROTECTION CONCERN AND REPORT FORM (VAPC)

Date of Report		Reported by	
Name of Student		Student Mobile #	
Time of incident		Location of incident	
Report passed on to		Date passed on	
<b>Details of incident (using students' own words)</b>			
<b>Notes on student behaviour and appearance</b>			
<b>Supportive action taken? If so, please describe this e.g., lengthy conversation with student</b>			
Signed by Reporter		Date	
Signed by Person		Date	
Signed by Receiver		Date	

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