1.0 Governance and Strategy

1.11 Safeguarding: Child Protection and Vulnerable Adults Policy

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Version Control Statement

Version	Date	Changes	Reason	Author	Next review
1	Aug 2022	New Policy	N/A	Safeguarding Lead	Aug 2023
2	Sept 2020	Legislative update	Annual Review	Safeguarding Lead	Sept 2022
3	April 2024	Updated legislations	**Update**	Safeguarding Lead	April 2025

External Reference Points
- *Keeping children safe in education Sept 2023,* DfES (2023)
- *Safeguarding Children and Safer Recruitment in Education*, DfES (2011)
- *Guidance for Safer Working Practice for Adults who Work with Children and Young People*, DCSF (01/2009)
- *Working Together to Safeguard Children*, DCSF (2023)
- *Principles for Safeguarding children and vulnerable adults*, JCQ (2019)
- Relationships and sex education (RSE) and health education', Department for Education, 2021

Related Policies and Documents
Affects all other policy documents. This document should however be read together with the following documents:
- Prevent Strategy and Policy
- Equality and Diversity policy
- Health and Safety Policy
- Student Anti-Bullying and Harassment Policy
- EDA College's Mission, Vision and Values
- Data Protection Policy

Contents

Safeguarding: Child Protection & Vulnerable Adults Policy

The purpose of this College Safeguarding Policy is to provide a clear direction to staff and others about expected behavior when dealing with safeguarding and child protection issues. This policy intends to make explicit the EDA College's (EDA) commitment to the development of good practice and sound procedures. This ensures that safeguarding concerns, referrals and monitoring are handled sensitively, professionally and in ways, which support the needs of all children, young people or vulnerable adults.

Scope: This policy applies to all staff and contractors that are responsible for or will come into contact with young students or vulnerable adults at EDA.

Objective: to protect and safeguard young students and vulnerable adults attending EDA.

Introduction

"Everyone in the education service shares an objective to help keep students safe by contributing to:

- Providing a safe environment for students to learn in education settings; and

- Identifying students who are suffering or likely to suffer significant harm and taking appropriate action to make sure they are kept safe both at home and in the education setting."

(*Safeguarding Children and Safer Recruitment in Education,* DfES 2011)

Incidents of abuse are not common BUT any young person aged between the ages of 0 and 18 and any vulnerable adult must be safeguarded whether this is in the home, in college, in the workplace or any other setting.

All staff and volunteers have a legal duty to report in strict confidence to their safeguarding officer if they have cause for concern and believe that an individual (employed, volunteer, learner, visitor or anyone else at EDA) for whatever reason:

- Harmed a child or vulnerable adult or is doing so
- Caused a child or vulnerable adult to be harmed
- Put a child or vulnerable adult at risk of harm
- Attempted to harm a child or vulnerable adult
- Incited another person to harm a child or vulnerable adult
- Is a victim of abuse

Abuse can take many forms but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional / psychological abuse
- Neglect

In addition to the above, vulnerable adults may also be subject to:

- Financial and material abuse
- Self-neglect

Vulnerable people must be protected from any form of harm. As such all complaints, allegations or suspicions must be taken seriously.

The following procedure must be followed whenever an allegation is made that a person has been abused or when there is a suspicion that abuse may be taking place.

Harming activities by other persons who are not employed staff or volunteers will be dealt with using normal College procedures for incident management. The police and the local safeguarding boards may nevertheless be involved.

EDA's Commitment

"Education staff have a critical role to play in helping identify welfare concerns, and indicators of possible abuse or neglect, at an early stage."

(*Working Together to Safeguard Children* 2023)

EDA is committed to safeguarding and promoting the welfare of all of its students under the age of 18 and vulnerable adults. This responsibility of all EDA staff is responsible for or in contact with a student at the College or in the workplace.

EDA will, therefore:

- establish and maintain an environment where students feel secure and are encouraged to talk and are listened to;

- ensure that staff can identify welfare concerns and take appropriate action to address their concerns;

- have a dedicated Safeguarding team

- ensure students know that there are trained staff at the College whom they can approach if they are worried or concerned;

- Recognise that the welfare of each young student / vulnerable adult is of paramount importance and that some students may be especially vulnerable to abuse, e.g., those with special educational needs, and those living in adverse circumstances, e.g., those witnessing violence.

- Comply with the prevent Duty to safeguard vulnerable students against the potential risk of radicalisation

Risk Assessment

EDA uses risk assessment to inform the planning of prevention and safeguarding activities. This takes place at several levels:

- EDA risk register – explicit section on Prevent and Safeguarding

- Staff safeguarding risk assessment – considering safeguarding measures to be put in place for various groups of staff

- Hazardous activity risk assessments – in line with the EDA health and safety policy

- Individual learner risk assessments – where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial.

Risk assessment is reviewed and updated regularly as needs demands and at least once every year.

Raising Awareness of Safeguarding Procedures:

All members of EDA must recognise the role they play in safeguarding. Safeguarding must be a topic covered within the induction of every member of the College community whether they are students, staff or employers used by the College for work experience purposes.

Students

Within the induction programme students will be made aware of the following:

- What constitutes abuse under Safeguarding

- The reporting procedures for self-referral or reporting suspected abuse of a friend or colleague

- To whom the referral should be made

- The responsibility each student has for another

Staff

Within the staff Induction programme employees will be made aware of the following:

- The procedure for reporting issues associated with safeguarding

- The key College personnel to whom the report should be made

- The responsibility of members of staff under the Safeguarding Policy and Procedure

- All new staff will complete Child Protection and Vulnerable Adult Awareness training

Employers

Any employer working with a student must be given training on EDA's Safeguarding Policy and Procedures by the learner's placement coordinator or nominated representative before the learner embarks upon the experience or placement. The placement Co-ordinator and employer must:

- Identify a key employee who will act as the main contact for the student on experience or placement for child protection

- Instruct that key employees on EDA's Safeguarding policy and Procedures and identify who their key point of contact is within College for any referrals for suspected abuse under Safeguarding.

- Sign a declaration that appropriate training has taken place and that the employee is fully aware of their responsibility and the reporting process (appropriate notes and procedures will be left with the employee for reference purposes).

Safer Recruitment and Selection

Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history in full with no gaps and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate DBS checks.

Safer Working Practice

Staff is referred to the *Guidance for Safer Working Practice for Adults Who Work with Children and Young People in Education Settings* (DCSF 2009).

Safe working practice ensures that students and vulnerable adults are safe and that all staff is aware that the nature of their work places them in a position of trust.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining references satisfactory to the College, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

It also includes undertaking interviews and, where appropriate, undertaking Disclosure and Barring Service checks.

Statutory changes, underpinned by regulations, are that:

- A DBS Enhanced Disclosure is obtained for all new appointments to the College's workforce. No new member of staff can start to teach with any learners until the DBS has been completed. If the DBS is delayed the new staff will not be left alone with any learners, and will be allocated desk space in the main office and supervised at all times.

- EDA will keep a single central record detailing a range of checks carried out on the staff.

- All new appointments to the College workforce who have lived outside the UK are subject to additional checks as appropriate.

- EDA will satisfy itself that supply/temporary staff have undergone the necessary checks.

- Identity checks must be carried out on all appointments to the workforce before the appointment is made.

Healthy Relationships

EDA actively promotes healthy relationships and incorporates the guidance from Relationships and sex education (RSE) and health education', Department for Education, June 2019.

EDA is committed to embrace the challenges of creating a happy and successful adult life, students need knowledge that will enable them to make informed decisions about their

wellbeing, health and relationships and to build their self-efficacy. Everyone faces difficult situations in their lives. These subjects can support young people to develop resilience, to know how and when to ask for help, and to know where to access support. We aim to promote the spiritual, moral, social, cultural, mental and physical development of pupils, at college and in society.

Our curriculum will support our learners to have a good understanding of: -

- Supportive family environment

- Respectful relationships and friendships

- Online and media relationships

- Sexual health and relationships

Safe Space

EDA is committed to providing an inclusive and supportive space for all students and staff. This applies to our whole community, whether an individual or a member within a group or representative forum.

We believe all students and staff should be free from intimidation or harassment, resulting from prejudice or discrimination on the grounds of age, disability, marital or maternity/paternity status, race, religious beliefs, sexual orientation, gender identity, trans status, socio-economic status, or ideology or culture, or any other form of distinction.

The College will therefore arrange mitigation to ensure the safety of our members and ensure a balance of opinions at any academic discussion or debate in line with our External Speaker Policy and Freedom of Speech principles. Freedom of speech is important, yet the intention to incite hatred is never acceptable.

E-Safety

Children and young people and adults can be vulnerable to exploitation or abuse through the medium of Information Technology.

The E-Safety Policy is updated and reviewed regularly to include any changes.

It is important that staff and volunteers are alert to potential risks vulnerable people may be exposed to, and that steps have been taken to mitigate the risk of this occurring, with specific reference to:

Content

e.g., exposure to age-inappropriate material, inaccurate or misleading information, socially unacceptable material (e.g., inciting violence, hate or intolerance) and illegal material (including images of child abuse;

Contact

e.g., grooming using communication technologies leading to inappropriate behaviour or abuse;

Commerce

e.g., exposure to inappropriate advertising, online gambling, identity theft and financial scams;

Culture

e.g., bullying via websites, mobile phones or other communication technologies, or inappropriate downloading of copyright materials (i.e., music, films, images); exposure to inappropriate advertising, online gambling and financial scams

Social Media

e.g., Twitter, Instagram, Facebook, and other social media sites can also include and be used for bullying, coercion and grooming and as a point of exposure for extremism, sexual misconduct and scamming (e.g., financial schemes).

Addressing these issues through training for staff and volunteers, and awareness raising with service users, or members of the community, will be undertaken by the College. If there is

any indication that a vulnerable person is experiencing difficulties in this area (for instance if they are reported to be spending long periods using a PC on their own or if they appear unnecessarily defensive, secretive or anxious about their PC use), then this must be taken seriously.

Further procedure and reference in the College's e-Safety and Social Media Policies

Designated Safeguarding Team

The designated Safeguarding Officer and the team will carry out their roles by *Keeping Children Safe in Education 2023 as well as the Care Act 2014:*

The Care Act 2014 statutory guidance defines adult safeguarding as: '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 circumstances.'

Referrals

- Management of referrals: The designated Safeguarding Officer continually develops an understanding of the community the College serves, associated risks and levels of resilience.

- Refer cases of suspected abuse as required; will represent College at child protection/ vulnerable adults conferences and core group meetings. The Designated Safeguarding Officer will be the expert within the College to support staff in liaising with other agencies and making assessments and referrals. Any staff member may be required to be part of strategy discussions with other inter-agency meetings and contribute to the assessment of at-risk cases.

- Support staff who believe a referral should be made to assess the appropriate course of action

- Refer cases to the Prevent Officer/ Channel programme where there is a radicalisation concern as required;

- Refer cases where a person is dismissed or left due to risk/harm to a child/vulnerable adult to the Disclosure and Barring Service as required; and

- Refer cases where a crime may have been committed to the Police as required.

- Refer and work closely with local council Redbridge Safeguarding Adults Board, Learning and Development team as well as Charity partners such as Mind and Shelter

- Manage referrals through the Redbridge website (Adult Triage, Community Solutions – 020 8708 7333, adults.alert@redbridge.gov.uk.

Training

- The designated Safeguarding Officer will have an understanding of staffing, volunteers Governance arrangements and training needs for safeguarding across the College updating the Governing Body and Principal accordingly.

- Maintain robust systems to monitor and record training of all staff, volunteers' etc. annually ensuring refresher time scales are evident. Training is delivered in line with the EDA training strategy. This will include bulletins, briefings and inset/development day(s) training as well as external events attended. Regular updates to be shared with staff and a system to record these communications.

- Designated Safeguarding Officer will ensure all staff and regular visitors have training on how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information accurately. Staff/volunteers will not make promises to any student and will not keep secrets.

- All staff will have access to resources/bulletins and attend any relevant or refresher-training courses to update their professional development within safeguarding Designated Safeguarding Officer coordinates this centrally.

Student Support

- The Designated Safeguarding Officer monitors the student support systems set up to record causes for concerns on students to ensure the quality of information is accurate, proportionate, and timely; support provided is appropriate and assessment/referrals are made appropriately when required. The recording and storing of information are kept in line with General Data Protection Regulations (GDPR).

- Safeguarding and student support records are kept separate from academic records; there is a clear recorded process of transfer of records to other organisations.

- Designated Safeguarding Officer will share risks and resilience of students proportionately with staff members/volunteers on a "need to know and in the student's best interest" and this is recorded and monitored to ensure risks/progress of students is understood. The Designated Safeguarding Officer will state the reasons for sharing this information and that this is carried out with strict confidentiality.

- All staff to take all allegations and concerns of any abuse seriously and ensure the victim feels safe and protected once the concerns have been highlighted. The staff member should then report the concerns to the Designated Safeguarding Officer so all necessary procedures are followed.

Compliance

- Designated Safeguarding Officer ensures systems are in place to induct new staff that are robust and monitored and non-compliance shared with the Executive Office so they can be dealt with immediately.

- Designated Safeguarding Officer to ensure this induction is updated annually in line with Keeping Children Safe in Education (2023).

- Designated Safeguarding Officer ensure each member of staff has access to and understands the College's Safeguarding (including Child Protection) policy and procedures including new and part-time staff.

- Designated Safeguarding Officer understands and supports the College with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting students from the risk of radicalisation.

Context and Risk

- Designated Safeguarding Officer encourages a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

- Designated Safeguarding Officer will liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

- Risk assessments will be completed as required and should where appropriately involve other agencies.

Written records

- The Safeguarding Officer shall retain a copy of:
    - The report
    - Any notes, memoranda or other correspondence dealing with the matter
    - Any other relevant material

- Copies of reports, notes etc. should be kept securely locked at all times and kept for a minimum period of seven years

- Copies of reports regarding allegations made against staff shall be kept securely sealed by the Principal until at least the 25th birthday of any child or seven years in any other case.

Vulnerable adults

A 'vulnerable adult' is a person aged 18 or over who is or may need community care services because of mental or other disability, age or illness, and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm, abuse or exploitation.

From the "No Secrets" publication (LAC (2000): *No secrets – guidance on developing multi-agency policies and procedures to protect vulnerable adults from abuse: guidance on*

developing multi-agency policies and procedures to protect vulnerable adults from abuse, Department of Health), this could include:

- people with learning disabilities;
- people with mental health problems;
- older people;
- people with a physical disability or impairment.

Their need for additional support to protect them may be increased when it is complicated by additional factors, such as:

- physical frailty or chronic illness;
- sensory impairment;
- challenging behaviour;
- drug or alcohol problems;
- social or emotional problems;
- poverty or homelessness.

A vulnerable adult is defined in full under section 59 of the 2006 Act and Article 3 of the 2007 Order.

In summary, a person is a vulnerable adult if they have attained the age of 18, and

- they are in residential accommodation;

- they are in sheltered housing;

- they receive domiciliary care;

- they receive any form of health care;

- they are detained in lawful custody;

- they are by an order of a court under supervision by a person exercising functions for Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43), in England and Wales;

- they are by an order of a court under supervision by a probation officer in Northern Ireland;

- is receiving a welfare service defined as the provision of support, assistance or advice by any person, the purpose of which is to develop an individual's capacity to live independently in accommodation or support their capacity to do so;

- they receive any service or participate in any activity provided specifically for persons due to age, disability, prescribed physical or mental problem, expectant or nursing mothers in accommodation or a person of a prescribed description not falling in the above;

- payments are made to them (or to another on their behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2012 (c.15), in England and Wales;

- payments are made to them (or to another on their behalf) in pursuance of arrangements under section 8 of the Carers and Direct Payments Act (Northern Ireland) 2002 (c.6); or

- they require assistance in the conduct of their affairs.

Safeguarding officers are to note that if a person has an impairment in the following list and that is their only vulnerability, then they are NOT vulnerable under this law:
- dyslexia
- dyscalculia
- dyspraxia
- Irlen Syndrome (also known as Scotopic Syndrome)
- Alexia
- auditory processing disorder, or
- dysgraphia.

Where any member of staff is concerned about or approached by a vulnerable adult student concerning abuse, they must tell the student that they are bound to pass on the information to a designated person in senior management as a matter of urgency. No student can be

promised that anything they say will be kept confidential if the matter is related to vulnerable adult protection or abuse.

Risk assessments must be carried out for all activities involving vulnerable adults, and reasonable, proportionate adaptations made to those activities as a result to safeguard the wellbeing of vulnerable adults.

EDA reserves the right to refuse to admit a vulnerable adult to a program of study, or other EDA-managed activities, if EDA judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate, including measures to manage inappropriate or disruptive behavior.

Regulated and Controlled Work: The Safeguarding Vulnerable Adults Act 2006 requires work that involves contact with children or vulnerable adults is designated as either "regulated" or "controlled" and hence requires an enhanced DBS check [see https://www.gov.uk/government/organisations/disclosure-and-barring-service].

Where EDA provides a program wholly or mainly for people with learning disabilities to help them learn a particular skill or support them in living independently, this will be a regulated activity. The exception to this is where a tutor is teaching one vulnerable adult in a group of

students aged 18 and over. In this instance, EDA will not be engaged in the regulated or controlled activity.

Guidance on Harm/ Abuse

Types of harm/ abuse to children under 18

Emotional/ Psychological
Action or inaction by others that causes mental anguish

Emotional harm is the emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.

It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may involve children witnessing aggressive, violent or harmful behavior such as domestic violence. Some level of emotional harm is involved in all types of ill-treatment of a child, though it may occur alone.
Grooming. Harassment. Inappropriate emotional involvement.

Physical
Any intentional physical contact that results in discomfort, pain or injury

Physical harm may involve assaults including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen syndrome by proxy. Supply drugs to children. Inappropriate/unauthorised methods of restraint.

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, holidays, tour, Megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts.

Sexual
Any form of sexual activity with a child under the age of consent

Sexual harm involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening.

The activities may involve physical contact, or 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. Downloading child pornography. Taking indecent photographs of children. Sexualised texting.

Neglect

Failure to identify and/or meet care needs

Neglect is the failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Peer on Peer abuse

Peer-on-peer abuse occurs when a young person is exploited, bullied and/or harmed by peers who are the same or similar age; everyone directly involved in peer-on-peer abuse is under the age of 18.

The forms in which this abuse can happen are not exclusive

- Physical and sexual abuse
- Sexual harassment and violence
- Emotional harm
- On and offline bullying
- Teenage relationship abuse
- Gang activity

All staff have a responsibility to look out for the signs of peer-on-peer abuse and intervene when they suspect this is happening. Peer-on-peer abuse can go unnoticed as it can be seen as banter or playful teasing but in fact can take on the role of sexual, emotional, mental and physical abuse.

Types of harm/ Abuse to Vulnerable adult

Emotional/ Psychological

Action or inaction by others that causes mental anguish

Inflexible regimes and lack of choice. Mocking, coercing, denying privacy, threatening behaviour, bullying, intimidation, harassment, deliberate isolation, deprivation.

Financial
Usually associated with the misuse of money, valuables or property

Unauthorised withdrawals from vulnerable adults' accounts, theft, fraud, exploitation, and pressure in connection with wills or inheritance.

Physical
Any physical action or inaction that results in discomfort, pain or injury

Hitting, slapping, pushing, shaking, bruising, failing to treat sores or wounds, under or overuse of medication, un-prescribed or inappropriate medication, use of restraint or inappropriate restraint, inappropriate sanctions.

Sexual
Coercion or force to take part in sexual acts

Inappropriate touching. Causing bruising or injury. Transmission of STD.

Neglect
Failure to identify and/or meet care needs

Untreated weight loss, failing to administer reasonable care resulting in pressure sores or uncharacteristic problems with continence. Poor hygiene, soiled clothes not changed, insufficient food or drink, ignoring resident's requests, unmet social or care needs.

Verbal
Any remark or comment by others that causes distress

Demeaning, disrespectful, humiliating, racist, sexist or sarcastic comments. Excessive or unwanted familiarity, shouting, swearing, name-calling.

Reporting instances of abuse

This procedure must be followed whenever any member of EDA staff hears of an allegation of abuse from a vulnerable adult or there is a significant concern that a vulnerable adult may be abused:

RECEIVE

- What is said

- Accept what you are told
- Listen without displaying shock.

REASSURE

- The student
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them that they are not to blame – avoid blaming the alleged perpetrator
- Do not promise that "everything will be all right now"

REACT

- Report any suspicions or concerns without delay to the designated safeguarding officer
- Respond to students, but do not interrogate
- Clarify anything you do not understand
- Explain what you will do next (i.e., inform the designated safeguarding officer/ assistant principal).

RECORD

- Make notes as soon as possible
- Describe observable behavior and appearance
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes.

SUPPORT

- Consider what support is needed for the student
- Ensure you are supported.

Immediately inform the designated safeguarding officer, providing full details of allegations of abuse, and if possible, give them your notes.

Discuss with the Safeguarding officer whether any steps need to be taken to protect the person who has told you about the abuse.

Never attempt to investigate suspected or alleged abuse by interviewing people; social services and the police are the people trained to do this. Safeguarding Officer to Refer as appropriate

Dealing with allegations of abuse against staff

EDA staff dealing with students and vulnerable adults are particularly susceptible to accusations of abuse. Their relationship with students may lead to allegations being made

against them by students or adults with parental responsibilities. In such cases these procedures need to be applied, a quick investigation conducted and resolution is a priority. The procedures to be followed, including when the alleged abuser is a volunteer or student, are as follows:

- *Always stop and listen straight away* to someone who wants to tell you about incidents or suspicions of abuse. If the time and place are inappropriate, arrange a suitable time and place as soon as possible.

- *If you can write brief notes* of what students are telling you while they are speaking. Retain your original notes and give them to the safeguarding officer.

- *Never make a promise that you will keep what is said confidential or secret.* If you are told about the abuse, you have a responsibility to report it so that action can be taken. Give reassurance that only those who need to know will be told.

- *Do not ask leading questions* that might give you an idea of what might have happened.

- *Immediately inform the designated safeguarding officer*, providing full details of allegations of abuse, and if possible, give them your notes.

Procedure for dealing with an allegation of Abuse against Staff

Under no circumstances should the member of the accused staff be informed about the allegation. Notification of the allegation will be managed through the official EDA procedures described below.

- Any suspicion, allegation or actual abuse of a young person by a member of staff must be reported to the Safeguarding Officer as soon as possible and at least within two hours. If within 2 hours of the initial concern, it has not been possible to contact the safeguarding officer the matter must be reported to the Deputy Principal.

- Full records must be made about the alleged incident/s as described above.

- In addition to notifying Children Services or Safeguarding Adults Board, where appropriate, the Safeguarding Officer will notify the Principal within 24 hours. The Principal will instigate an initial assessment of the allegation, relevant investigations and enquiries and take appropriate action by the DFES guidance Safeguarding Children in Education: Dealing with Allegations of Abuse Against Teachers and Other Staff.

- The College will, as deemed appropriate through the investigation, co-operate fully with the Police, Social Services and other external organisations in the execution of their duties within the investigation.

- The Executive Office will be kept informed of any situation where the investigation of an alleged incident under the Safeguarding Policy and Procedure is necessary and the necessary action taken.

- Parents or carers of a young person or vulnerable adult involved should be told about the allegation as soon as possible if they do not already know of it (subject to discussion with the relevant authority). They should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

- If the designated safeguarding officer is the subject of the allegation or complaint, the matter must be reported directly to the Principal.

- If the Principal is subject to any such allegation or complaint, the designated safeguarding officer will contact the remaining members of the Executive Office.

Suspension of a member of EDA staff should not be a default response to an allegation; it should be used only if there is no reasonable alternative. HR policies must be followed if this course of action is required. Suspension may be appropriate where:

- a student or students are at risk;
- allegations are so serious that dismissal for gross misconduct is considered
- suspension will allow the investigation to proceed unimpeded.

Allegations found to be unfounded, unsubstantiated or malicious should be removed from personnel records and not mentioned in employer references.
EDA's student behavior and anti-bullying policies outline acceptable behavior towards other students. Allegations of abuse by one student against another student must be reported to the safeguarding officer, who will take necessary measures to safeguard the student.

Students' induction must include informing them of EDA's Safeguarding policy and procedures in English and outline that they should contact a safeguarding officer if they have any concerns

Guidance to staff on appropriate behaviour

The following guidance is given to all staff to avoid putting themselves or students at risk of harm or allegations of harm to a student:
- EDA appreciates that work-based learning tutors attend the workplace and carry out one-to-one tuition or coaching. A weekly plan should be submitted to your line manager on a Monday stating where you will be and you should phone the college or line manager if working out of hours to confirm that the session has been concluded.

- If you are on your own with a student in a classroom, ensure the door is always open, so visibility into the room is clear, and that, where possible, there is another member of staff nearby.

- Avoid any physical contact with any student.

- Do not offer any student a lift in a car or accompany them home on public transport in any circumstances.

- Seek advice from the safeguarding officer if you do not feel comfortable with a student's request to speak to you.

- Recognise that bullying can develop into abuse; also, be generally vigilant for early warning signs of abuse or neglect.

Electronic Communication

DO NOT

- give your contact details, including e-mail, house or mobile telephone numbers.

- share or store personal mobile numbers of students on your mobile phone;

- view photographs/videos on an electronic device you have confiscated from a student.

DO

- keep phone contact and e-mail communication formal (i.e., by using EDA e-mail addresses) and copy in another member of staff if communication is not coursework-related.

- when using a social networking site, ensure that details are not shared with students and that privacy settings are set at maximum. Think carefully before 'friending' former students, especially those with friends who are current students.

- Delete any student data you have temporarily stored on any electronic device (e.g., a photograph for a newsletter or a student contact details) the moment it is no longer needed. Be prepared to demonstrate that any student data captured has only ever been used for professional, centre-based purposes.

Practice that should never occur

Staff and volunteers should:

- never encourage or participate in an intimate and/or sexual relationship with young/vulnerable people enrolled on a course of study at EDA or any other young person under the age of 18.

- never engage in inappropriate physical or sexually provocative behaviour with young/vulnerable people enrolled on a course of study at EDA or any other young person under the age of 18.

- never make sexually suggestive or lewd comments to a young/vulnerable person, even in fun.

- never develop relationships with a young/vulnerable person who could in any way be deemed exploitive or abusive.

- never act in ways that may be deemed abusive or may place a young/vulnerable person at risk of abuse.

- never smack or physically hit a person, reduce them to tears as a form of control, or intentionally shame, humiliate, belittle or degrade them.

- never allow people to engage in unacceptable behaviour or use offensive or discriminatory language without being challenged.

- never allow allegations made by a person to go unchallenged, unreported or not acted upon.

- never expose young/vulnerable people or vulnerable adults to activities that compromise their health or personal safety.

- never divulge personal contact details to a young person or vulnerable adult or engage in communications with them using your own home or personal mobile phone or through your home e-mail account.

- never issue any learner's contact details to anyone.

- never do things of a personal nature for a young person or vulnerable adult that they can do themselves.

- never condone or participate in the behavior of young people, which is illegal, abusive or exposes anyone to any degree of danger or risk (that may or may not lead to injury, distress or illness).

- never create or access any form of pornography, including via the internet