

Safeguarding Policy Vulnerable Adults

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Version 1

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Statement of Intent

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that all staff are aware of methods to ensure a safe environment for colleagues and students alike; in particular children (Please refer to the Safeguarding of Under 18s Policy) and vulnerable adults.

As such, NCG will ensure that the service they provide...

- **is accessible, well publicised, ensures confidentiality and is available in an environment that is sensitive to the needs of adults at risk and children.**
- **takes account of the views of children, young people, and adult service users, in the decisions about and delivery of services.**
- **ensures that racial heritage, language, religious beliefs, sexuality, gender and disability is taken into account - for example by the use of interpreters or by making adjustments to enable access for disabled people.**
- **takes into account the service user's wishes and feelings and balances this against their rights and need to be safeguarded.**
- **considers if there are risks from any form of abuse; mental health problems; misusing drugs and alcohol; or a risk of homelessness.**

Safeguarding at NCG: An Overview

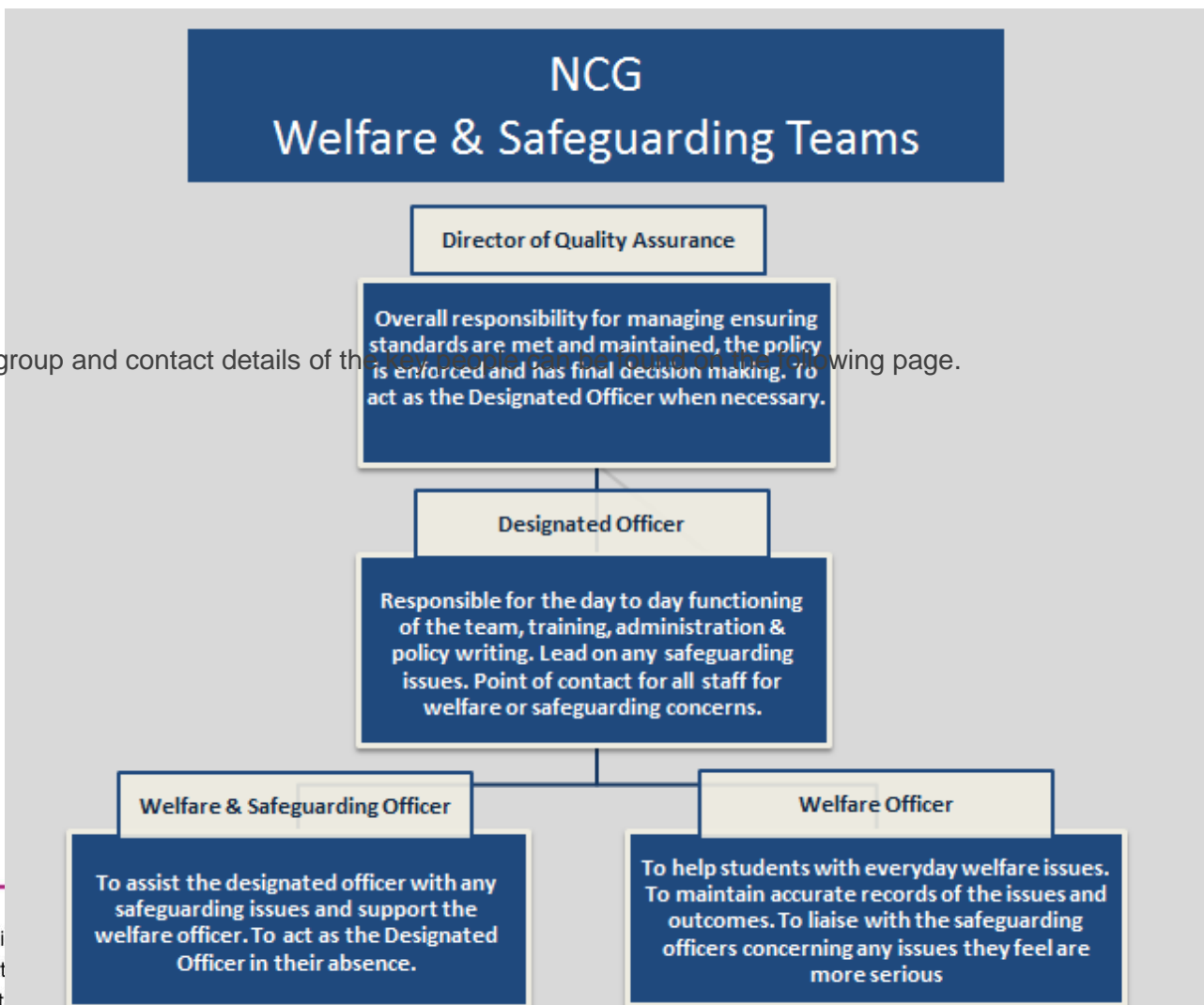
This document provides detailed information regarding the college's responsibilities and procedures in relation to the welfare and safeguarding of adults at the college who could be considered vulnerable.

To ensure the policy is up to date with current legislation, it will be reviewed bi-annually by the Designated Officer and the Director of Quality Assurance. The Designated Officer will also make any necessary amendments in-between official reviews. To ensure accurate and up to date records are maintained, all are monitored on a monthly basis by the Designated Officer (Please see page 8 for records kept).

NCG Welfare & Safeguarding Teams

NCG has two schools, one in Manchester and one in Liverpool. The following structure is applicable across

the group and contact details of the relevant individuals are on the following page.



Key People:

Covering the whole group is the Director of Compliance, Mark Harmer. He is based in Manchester (see below for address & telephone), and can be contacted via email: mark.harmer@newcollegegroup.com or on Extension 214.

NCG Manchester

Contact Details	9 Portland St Manchester M1 3BE Tel: +44 (0)161 233 4290
Designated Officer	Charlotte Kerns Extension 221 charlotte.kerns@newcollegegroup.com
Safeguarding & Welfare Officer	Peter Almeida Extension 221 peter.almeida@newcollegegroup.com
Welfare Officer	Liz Lonsdale Extension 212 liz.lonsdale@newcollegegroup.com

NCG Liverpool

Contact Details	Graeme House Derby Square Liverpool L2 7ZH Tel: +44 (0)151 236 2749
Designated Officer	Kerill Kennedy Extension 3005 kerill.kennedy@newcollegegroup.com
Safeguarding & Welfare Officer	Riccardo Lanza Extension 3007 riccardo.lanza@newcollegegroup.com
Welfare Officer	Christine Flanagan Extension 3006 christine.flanagan@newcollegegroup.com

The Difference between Welfare & Safeguarding

The line between welfare and safeguarding is very fine, and what may appear to be a welfare issue could easily develop into, or be the signs of a safeguarding issue. As explained below, safeguarding specifically relates to a vulnerable adult who is, or could potentially, be suffering abuse at the hands of another person.

According to the Care Quality Council, **Safeguarding** means:

“Protecting people’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect”.

It is this definition which forms the basis of our policy and procedures. For the purpose of this document the following definitions apply:

Definitions

Vulnerable Adults: Whilst it is easy to identify a child, it is not so clear who is considered a vulnerable adult. According to the Lord Chancellor’s Department (1997) a vulnerable adult is defined as thus...

“An adult who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect, him or herself against significant harm or exploitation”

[\(http://www.safeguardingmatters.co.uk/\)](http://www.safeguardingmatters.co.uk/)

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited.

This may include a person who:

- Is elderly and frail
- Has a mental illness; including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

Safeguarding means the active prevention and protection against the abuse of any person, who works or studies at New College Group, and who may be considered vulnerable.

Abuse means a violation of an individual’s human and civil rights by other person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. Within this context abuse can take the form of:

- **Physical abuse:** including hitting, pushing, kicking, and misuse of restraint or inappropriate sanctions.

- **Sexual abuse:** including sexual assault or acts to which a child did not, or could not consent to.
- **Psychological abuse:** including emotional abuse, bullying, threats, deprivation of contact, humiliation, intimidation, coercion, verbal abuse.
- **Financial or material abuse:** including fraud or damage to property.
- **Neglect or acts of omission:** including ignoring medical or physical care needs, inadequate nutrition and failure to provide appropriate health, social or educational services.
- **Discriminatory abuse:** including racism, sexism and other forms of harassment.
- **E-abuse:** via the internet, or other e-technologies. (See E-Safety Policy)
- **Being radicalised:** being vulnerable to or at risk from radical or extremist groups. (See the Prevent Policy)

Signs of Abuse:

Staff should be aware that the following could be signs that an adult is at risk of, or is being abused and they should report these immediately to the Safeguarding Team. As the signs may apply to different forms of abuse they have not be related to any particular type, but noticing any should be immediate cause for concern. The list is not exhaustive, and if staff have any concerns at all, they should follow the reporting procedures.

Physical Signs

- Frequent physical injuries such as, bruising, fractures, burns, cuts
- Weight loss or weight gain: changes in appetite
- Poor personal hygiene
- Changes in style of dress or appearance

Psychological & Behavioural Signs

- Sudden changes in behaviour or personality: becoming withdrawn, anxious, depressed, extroverted, sexually inappropriate or aggressive
- Avoiding contact with others, especially members of the opposite sex
- Signs of alcohol or drug misuse
- Sudden poor attendance or participation in lessons
- Being unusually tired or frequently sick
- Not wanting to return home

Preventative Measures

Safety on the Premises

- Identification of students with vulnerabilities. Any student who declares a condition that may make them vulnerable has their details and condition recorded on a monitoring sheet which all staff have access to. In addition to this, their photo and basic details are kept in a folder in the Administration office and Academic office for the duration of their stay. A symbol is also attached to their name on the register, so if they are absent contact can be made with them as soon as possible to check if they are okay (Please see Attendance Policy). All of which are intended to alert staff to people who may need extra support whilst maintaining confidentiality.
- Visitors: all visitors must sign in and out of the college and wear a visitor's pass.
- Any external speakers or trainers, and events are subject to a risk assessment. They are also given a copy of the staff code of conduct which they must sign prior to the event.

Internet Safety

NCG has a duty and responsibility to ensure that everyone that comes into the organisation is safe and that staff are all aware of methods to ensure a safe environment for colleagues and students alike, in particular children and vulnerable adults. As the use of technology is part of daily life, it is important that both staff and students have an awareness of using this safely, both inside and outside the college environment. (Please see the E-Safety Policy for further details.)

Safer Staffing

NCG operates rigorous recruitment practices across all departments with the aim that all its employees are safe to work with under 18s: this includes host families, whose DBS status is kept on their CLASS profile. Our recruitment practices can be found in the Safer Recruitment Policy and information pertaining to all staff can be found on the Single Central Register, which is maintained by the Human Resources Officer.

Appropriate Staff & Student Relationships

Staff should bear in mind that many students may form personal attachments to them, due to various reasons; for example, feeling lonely or homesick. These attachments are understandable, however, students may misinterpret attention outside of working hours or sharing personal contact details as being more than just a professional relationship and as such it is not allowed. Staff must adhere to the following in terms of their interaction with students.

- Staff should not socialise with students outside of working hours, unless they are leading a social activity organised by the college.
- No personal emails or telephone numbers of staff should be shared with students; if a student requests this, then work contact details must be given. During Social Activities/Trips the college's emergency telephone number is given to all students in case of an emergency.
- Requests from students for a member of staff to befriend them on Facebook, or any other social media site, should be politely refused and the student directed to the college's Facebook page. As we are a predominantly adult college, if an adult student requests this, then it should be discussed with the member of staff's Line Manager to deem if it is appropriate or not.

It may be difficult at times to refuse a student, but it should be clearly explained that this is college policy.

Staff Induction

All new staff are given the following policies and information to read and sign during their induction or in cases where this is not practical, within a week of them commencing employment.

- Welfare & Safeguarding Policy
- Safeguarding Vulnerable Adults Policy
- Prevent Policy
- E-Safety Policy
- Staff Code of Conduct
- Attendance Policy (Teachers only)

In addition to this they must also complete online Level 1 Safeguarding & Prevent Training, ideally prior to commencement of employment, or within a week of starting.

Training

In addition to the initial training described above, staff receive Level 2 training following successful completion of their probationary period. All members of the Safeguarding Team are trained to Level 3, as are the Managing Director, the Principal, the HR Officer and all Senior Managers. All managers, are also trained in Safer Recruitment. Information regarding training is entered onto the Central Register by the Designated Officer and can be found on the N-Drive in Compliance.

Maintaining Good Safeguarding Practice

As part of maintaining good practice, the Safeguarding Team meets on a monthly basis, or as required, to discuss cases or concerns, look at current documentation (See below), and share good practice and ideas.

In addition to this, there is a Safeguarding Improvement Board made up of staff from different departments, which meets on a quarterly basis to review the policies and procedures, discuss any improvements and update the Safeguarding Action Plan.

Maintaining Accurate & Safe Records

All records are kept in the Safeguarding Folder on the N-Drive in Compliance; this is accessible to only the people responsible for Safeguarding, the Director of Compliance & the Principal. These records include:

- The Single Central Register, which is added to on an AD Hoc basis in terms of new staff being employed, but is checked on a weekly basis by the HR Officer and Designated Officer to ensure DBS checks and other information is up to date.
- All completed forms, dealing with and Welfare or Safeguarding concern.
- A Record of Concerns Tracker, which offers at a quick glance, what concerns have been raised, which are ongoing, and which have been resolved. This again is updated as needed but monitored on a weekly basis.

The above documentation is checked on a monthly basis by the Designated Officer against quality assurance criteria to make sure it is being updated properly and is fit for purpose. If any issues arise they will be highlighted in the action section on the QA form and addressed within a specified time.

How we address issues that arise but are not covered by the current policy.

As the policy and procedures are working documents there may be occasions when a situation will arise that is not dealt with by the current policy. In these cases, unless someone is at immediate risk, no actions will be taken by an individual until...

- The manager/s of the relevant departments and the Designated Officer have been informed of the issue, either by phone or email.
- A meeting has taken place between these persons, to decide upon a course of action to rectify the situation. If this is not possible, then communication via email will be used.

Once an action is decided it will be acted on straight away. Following this, the following will be actioned:

- The outcome of the above will be reflected upon to assess its efficacy, and the processes revised as necessary.
- Any resulting amendments to the Policy & Procedures will be written by the Designated Officer, forwarded and approved/amended by the relevant Manager/s, the Compliance Director & the Principal prior to the Policy being updated.
- These changes will then be communicated to other staff.

How we ensure the policy is up to date and the relevant documentation is fit for purpose.

- Any amendments from the actions outlined in the previous section will result in the policy being updated and the changes circulated to all staff.
- The Designated Officer will keep up to date with current legislation and good practice by monitoring the government's website, and those of other relevant bodies such as the NSPCC: making amendments as necessary.
- All staff are invited to make suggestions to the design of forms or to procedures, if they feel the current practice is not fit for purpose. Any suggestions will be discussed within the Welfare and Safeguarding team and changes implemented if deemed appropriate.

Supporting Vulnerable Adults

Any adult that has been identified as being vulnerable will be offered immediate and ongoing support by a member of the Safeguarding Team, with possible additional support from the SEN Specialist, depending upon the nature of their needs. If their need exceeds the support the college feels able to provide, then external agencies will be contacted for more expert help and advice.

Pre-Arrival Information & Documentation

All students who apply to study at the college are sent a medical declaration form which asks the student to declare any medical conditions, including mental health conditions that they may have. It also requests any information pertaining to a person having a physical or learning disability or any specific educational needs. It is hoped that students disclose this information prior to arrival so that a plan of support can be in place for when they arrive; however, this is not always the case and so we have other procedures in place (please see following sections) to try and identify any vulnerability once a student has arrived.

First Day Procedures

Any students who have not provided us with a medical declaration form are given one to complete during the enrolment process, again it may not always be the case that they feel comfortable disclosing something and so information regarding support staff at the college and keeping themselves safe, is given during induction. We also provide a Student Handbook which includes the Emergency Number, general information about Manchester and contact details for external support agencies that may be able to offer help should they need it.

Accommodation

If a student is identified as being vulnerable and is staying with a host family, we would seek their consent to share their support needs with the family. If the student refuses, an assessment will be made as to whether or not there is a need for the host family to know. If we feel that it is necessary for the host family to know some information, the student will be informed prior to any disclosure and if they are still not happy then alternative accommodation will be found. If a student feels unsafe in their accommodation or in the area around it, alternative arrangements will be made immediately.

Ongoing Support

Having identified a student as being a vulnerable adult, an Action Plan will be drawn up with them to identify how we can best support them in and out of college (Please See Appendix). The plan will be

shared with other staff on a need to know basis. The plan will be stored on the N-Drive, in Compliance/Safeguarding/Vulnerable Adults, and a copy will be put in the class file, inside the Learner Profile, so it is not immediately visible and confidentiality is maintained.

Procedures to Follow for Safeguarding & Welfare Concerns

Raising a Concern

Should any person within the organisation suspect that a welfare or safeguarding issue has arisen, they must inform one of the Safeguarding Team as close to the event as possible, and no later than 24 hours after they first become concerned.

In the event of there being a concern out of hours, an email should be sent and a call made to the Out of Hours Officer on the emergency number: +44 (0)7535816060 to inform them of the concern. If it is felt that immediate action needs to be taken, the Out of Hours Officer will act in accordance with the policy and hand over to one of the safeguarding officers as soon as the college is next open.

Following any reported concern, the officer informed should immediately pass on these concerns to their counterparts so that a decision can be made as to what action should be taken. In the case of a serious concern being raised, immediate risk of harm, or an allegation of abuse by a staff member or a fellow student, the LADO (Local Authority Designated Officer) and/or Police must be informed immediately.

Only the Designated Officer, (or nominated person in their absence), will make an external referral.

Handling a Disclosure of Abuse & Ensuring Confidentiality

If you are approached by a student wanting to talk you should:

- Always listen positively and reassure them. If you can, try and ensure a degree of privacy, but this may not always be possible.
- Do not show revulsion or distress, however distasteful the events are.
- Stay calm and controlled.
- Let the student know at once that it was not his/her fault and keep restating this.
- Reassure the student that you still care for them and that what they have said does not make you care less.
- Do not make false promises, i.e. that you will keep the abuse a secret or that the police will not be involved. Do not promise confidentiality.
- Make them aware that disclosure will be reported to only those that need to know and can help.
- Do not question the student; try to limit your involvement to listening.

It is imperative that what is said, is documented as accurately as possible, and that leading questions are not used as these may render the documentation inadmissible should legal action be taken. By leading questions, we mean direct questions that are asking if someone did something specific.

For example:

Did X touch you here?

Did you feel upset?

Instead, ask open questions like:

Can you tell me what happened?

How did this make you feel?

This allows the person to tell things in their own words, without being led by another person's assumptions about what happened or might have happened. This should be documented using, as closely as possible, the words of the young person or vulnerable adult. This must be documented on a *Welfare/Safeguarding Record of Concern Form*; available on the N-Drive in Shared Documents, Forms/Compliance/Safeguarding. The completed form should be emailed to the Designated Officer and will be stored on the N-Drive in the Safeguarding Folder and filed in a separate folder named with the student ID: this is only accessible to the Safeguarding Team, The Principal and the HR Officer.

Investigating a concern

Once it has been established that there is a safeguarding or welfare issue, the following actions should be taken. The persons involved should be contacted, and if necessary removed from an unsafe situation immediately. A meeting between the student whom the concern is about and one of the Safeguarding & Welfare Team should take place within 24 hours of it being reported. If this is not physically possible, for example it is the weekend, contact should be made by phone or email. In this case, a *Welfare/Safeguarding Follow-Up Form*, available on the N-Drive in Shared Documents, Forms/Compliance/Safeguarding, should be completed by the welfare or Designated Officer, and stored on the N-Drive, Compliance in the Safeguarding Folder.

Handling Allegations Against Staff & Students

Any staff who have concerns about a colleague, or a student, being a perpetrator of abuse must report them to the Designated Officer. The reporting member of staff will be protected by the Whistleblowing Policy (See the Staff Handbook), and should not feel concerned about making an allegation. Confidentiality must be maintained at all times, any breach of this, could result in disciplinary action.

Initial Response

In cases where a member of staff or another student has been accused of some form of abuse, the utmost should be done to keep this allegation confidential until it has been fully investigated. Upon the receipt of a

Record of Concern Form, naming a staff member or a student as a possible abuser, the Designated Lead will contact the LADO immediately. Two possible courses of action may be taken following consultation with the LADO, and in line with their recommendations.

1. The member of staff, or student, will be asked to remain at home until an investigation has been completed. In the case of staff, this will be done in accordance with the College's Disciplinary Procedures (See Staff Handbook).
2. The member of staff, or student, will be allowed to remain in the college, but restrictions will be put in place. For example, a student will be placed in another class, where possible at a different time of day. They will have no contact with the alleged victim and must be supervised during all breaks. The staff member will not engage in any duties that could put them in contact with the alleged victim, their working hours arranged so as to minimise any casual encounter, and possibly work under supervision.

The above actions will be discussed in a meeting by Senior Management and documented on an *Initial Consideration Meeting Form*, available on the N-Drive, Compliance – Safeguarding – Forms.

During an Investigation

Whilst an investigation is being carried out, support will be offered to any person against whom an allegation has been made. If the allegation is against a student, they will be supported internally by a member of the Safeguarding Team, and external support will be signposted. Where a staff member has been accused, they will be referred to the HR manager, who will arrange for them to receive support and advice from an independent agency.

Following an Investigation

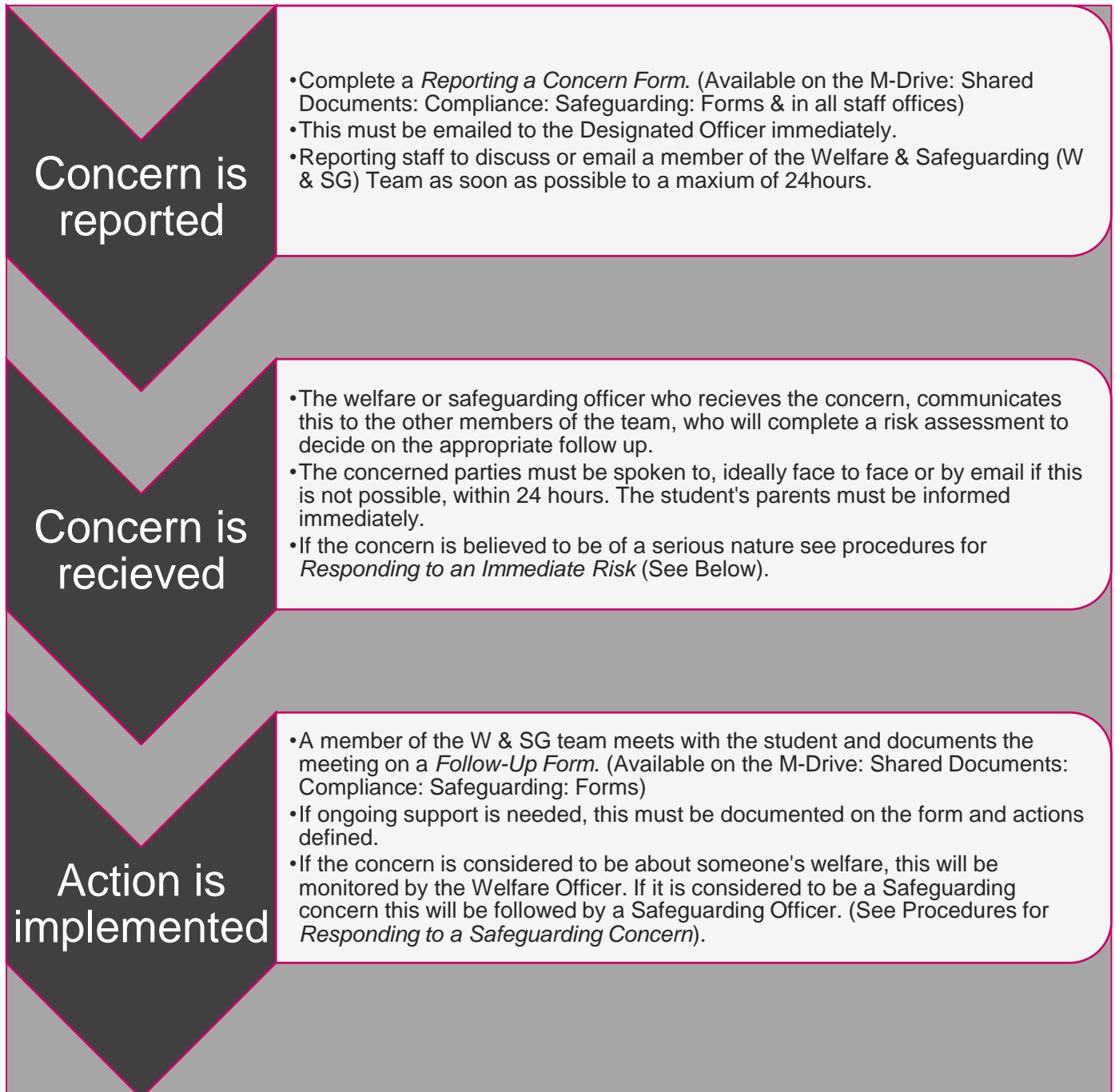
If the allegation is proved to be true, the member of staff or student will be removed permanently from the college. In the case of a student their embassy and UKVI will be informed of the offence immediately. In the case of a staff member, the DBS will be informed, as per the law.

If the allegations are proved to be unfounded, this will be clearly documented on the records. All records will be kept, as per Government recommendations, in a password protected folder within the limited access Safeguarding Folder on the N-drive.

Summaries of the Safeguarding procedures can be seen on the following pages.

Procedures for Reporting a Concern

All staff must follow the steps below if they have any concerns about a student.



Procedures for Responding to a Safeguarding Concern

These procedures must be followed by the Safeguarding Officer involved

- If a risk of possible abuse has been identified, then the SG Officer must consult with the Designated Officer to decide on the level of risk involved.
- The team must then decide what action to take and document this on the

Procedures in the Event of an Allegation against a Staff Member or Student.

These procedures must be followed by the Safeguarding Officer involved



Appendices

Forms & Useful Information

Welfare/Safeguarding Record of Concern Form

Student Details		
Name:		I.D:
Date of Birth:	Age:	Gender:
Address:		
Phone:		Email:

Your Details	
Name:	Job Role:
Phone:	Email:

Details of the Concern: Please be as factual and detailed as possible.
Are you recording your own concern or reporting the concern of someone else?
What has happened, said to have happened, or been seen?
When and where did this happen?
Who else was involved and how?
Was the person who the concern is about able to say what happened? (Please record their words)
Who has been told about it and when?
Signature of Person Recording the Concern:
Date:
Signature of the Safeguarding Officer Receiving the Concern
Date:

Welfare/Safeguarding Follow Up Form

Name: ID:

Date of Initial Referral:

Please document any initial follow up to a Welfare or Safeguarding concern here. Please sign and date each entry.

Issue	Actions Taken	Outcome	Initial Follow Up

If further support and follow up is required, please document it below.

If none is required, please explain why here:

Date	Actions Taken	Outcome	Follow Up

Please complete a final entry when follow up ceases, explaining why.

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This form can be used to assist in assessing and recording the risks of allowing someone to start paid or volunteer work. It should only be used in circumstances where to not employ the person would result in a severe disruption of service provision.

The completion of this risk assessment form is the responsibility of the appointing manager and must be authorised by the Principal **before** the person can start. This completed risk assessment form must be placed on the individual's personnel file.

Circumstances in which the form may be used:

- The appointment is necessary to allow the service provision to continue.
- An enhanced, DBS check has been applied for.
- The person has no unsupervised contact with children or vulnerable adults.
- They have no access to sensitive records, particularly information about individual children or vulnerable adults.
- This risk assessment and risk management plan has been completed and signed off by the appointing manager and the Principal.

Please note that candidates may be able to carry out induction, training and supervised tasks whilst waiting for the DBS certificate to be returned.

If you require any assistance with completing this Risk Assessment please contact one of the following:

- Fareeda Haq (Whole group): fhaq@newcollegegroup.com
- Charlotte Kerns (Manchester): ckerns@newcollegegroup.com
- Kerill Kennedy (Liverpool): kkennedy@newcollegegroup.com

PART 1 – FOR THE APPLICANT TO COMPLETE

Name:	Date of Birth:
Job/ Position Applied for:	Work Base:

Please read and sign the following declaration. Please be aware that to withhold information or to give false information will be regarded as an attempt to falsify records which constitutes gross misconduct and will, if proved, lead to dismissal and reporting to the relevant authorities.

Have you ever been cautioned or convicted of any offences?

We need to know who was involved, when it occurred, what occurred, where the incident or offence was committed and why it was committed. It is also necessary to explain how you, the applicant, now feel about the incident or offence. Please give details below.

Declaration by Applicant

I, _____, confirm that I am eligible to work with students under 18 years of age. I am not on a Sex Offenders' Register nor have I committed a crime which prevents me from working with students under 18 years of age.

I certify that the information I have provided on this document is true and complete. I understand that to knowingly make a false statement or omit information will result in my job or volunteering application being unsuccessful or, if employed, in my facing possible dismissal or other disciplinary action.

Sign & Print name:

Date:

PART 2 – FOR THE APPOINTING LINE MANAGER TO COMPLETE

Name of Candidate:	Date of Birth:
Job Title:	Work Base:

Has the Recruitment Checklist been completed, including all of the following?	Confirmation/Details

Employment gaps, discrepancies or anomalies	
Appropriate and satisfactory references	

The purpose of this assessment is to ensure that any external training or event is complying with the College's overall Safeguarding Policy and Prevent Duty. If you are unsure whether the contents of a presentation, speech or course are meeting the requirements or not then please speak to the Designated Officer, who will be happy to advise. The form needs to be completed and approved (by a member of the SMT), at least one week prior to the training or event taking

Give details where you have obtained clarification or missing information on the applicant or verification of the referee's position in the organisation.	
Have you checked and verified that the candidate's qualifications fulfil the requirements in the selection criteria?	
Has the candidate completed the self-declaration? Confirm that you have actively asked the person if they have any convictions, cautions, reprimands, warnings, bind-overs, pending prosecutions or disqualifications.	
Have you seen and verified asylum and immigration checks?	
Has the candidate completed a new DBS certificate Application form?	
Has the candidate been a resident outside of the United Kingdom? If yes, is a Police Check or DBS equivalent from that country being sought?	
Level of Risk: Please complete the level of risk posed by appointing/employing the individual in this job. Give reasons.	
High Risk	
Medium Risk	
Low Risk	
Is this person suitable to start work before the DBS is returned under the conditions proposed above? Yes/No Comments: (Reasons for decision) Outline protective measures to be used to reduce the risk:	
Risk Assessment completed by: Sign & Print name (Manager) Date:	Risk Assessment Authorised by: Sign & Print Name (Principal) Date :

Risk Assessment External Speaker/Trainer or Event

Name of Speaker/Trainer		Name of NCG Staff Responsible for Organising the Training/Event	
Course/Event Title No. of Attendees.		Date & Time of Session/s or Event	
Resources to be used			
Contents checked and suitable?	Yes/ No	Please sign & date to confirm content checked:	
Have any actions been put in place as a result of the content assessment?			
SMT Approval: Please sign and date to confirm you are happy for the event/training to go ahead.			