

BHCC Adult & Community Learning Service
Safeguarding Policy and Procedures including Prevent Duty

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BHCC Adult & Community Learning Service

Safeguarding Policy and Procedures including Prevent Duty

This policy was prepared on 1 December 2020
 Reviewed by BHCC Safeguarding Team July /2021 – Alison Laing

Review dates: 1 July 2022

Key Contacts		
Role	Name	Contact details
Designated Safeguarding Leads	Amir Bahrami/Adult Learning Manager Programme Leads: Kirsty Cregan or Jim Hynes (TBC)	07795 336074 07584 581001 TBC
Overseeing Head of Service Manager	Carla Butler	07795 365434
The Governance Member responsible for Safeguarding	Carla Butler	07795 365434
Local Authority Designated Officers(LADO)	Darrel Clews (children's lead) Katherine Taylor-Birnie (adults' lead)	07953 35879 07900 05269
Emergency Duty Contact	Emergency Duty Service – after hours, weekends and public holidays	01273 335905 or 335906
BHCC Adult Social Care – for reporting concerns about adults	Access Point is the main point of contact for Adult Social Care is Email: AccessPoint@brighton-hove.gov.uk Safeguarding adults at risk form for professionals (brighton-hove.gov.uk) an online form to report a concern for professionals	01273 29 55 55 or On-line referral
BHCC Children's Social Care – for reporting concerns about children	Front Door for Families a single point of contact for services for children and families, called Front Door for Families. Contact Front Door for Families online an online form for professionals	01273 290400 or On-line referral
BHCC Health and Adult Social Care directory	Health and Adult Social Care directory (brighton-hove.gov.uk)	Sign posting list of agencies
BHCC Prevent Co-ordinator	Nahida Shaikh	01273 290584 0771 730292
Sussex Safeguarding Policies and Procedures	https://sussexsafeguardingadults.procedures.org.uk/	

1. Introduction

BHCC ACL service aims to provide the safest and best learning environment possible so all our learners can succeed and everyone feels safe and secure. Safeguarding is intended to promote the welfare of our learners, especially those who are most vulnerable, by protecting them from bullying, harassment, abuse of any kind, discrimination or victimisation.

Under the Prevent Duty this also includes supporting any learners who are at risk or being radicalised or drawn into terrorism by challenging the spread of terrorist ideology and providing early intervention designed to divert people away from terrorist activity. This does not mean we discourage our learners from having political or religious views and concerns, but it is about supporting learner to act upon concerns in non-extremist ways.

BHCC's ACL Safeguarding Policy has been drawn up in line with the Care Act 2014, Pan Sussex Safeguarding Adults Policy and Procedures, Edition 4 and the Pan-Sussex Child Protection and Safeguarding Procedures.

Whilst the service works predominantly with adults, our Family Learning Team works with parents and their children and we may also work with some young people aged 16-18. We fully recognises the duty placed by Section 10 of the Children Act 2004, with regard to the need to safeguard and promote the welfare of children and young people.

BHCC delivers its adult learning service through a combination of subcontracted and in-house provision. This policy relates to in-house provision. Expectations of BHCC's sub-contractors is set out in the contract agreements. These requirements place responsibility with the service provider for management and control of safeguarding issues. All concerns are reported to the Designated Safeguarding Lead, as required, and reported as part of contractual meetings

Both in-house and sub-contracted concerns are reported to the Governance Board meetings. The Governance Board has overall oversight of level and nature of safeguarding concerns and is responsible for any overriding action required.

2. Purpose

The aim of this policy is to ensure that BHCC's ACL service meets its responsibilities to ensure the safety of learners, including adults at risk, and children or young people (any student under 18). The policy establishes practices and procedures to minimise risk of abuse, sets out clear responsibilities and procedures to raise awareness, and ensures a clear framework for quick and appropriate response when abuse or risk of radicalisation is suspected.

BHCC's ACL Prevent Duty strategy seeks to protect our vulnerable adults against messages of all violent extremism. BHCC values freedom of speech and the expansion of beliefs/ideology as fundamental rights underpinning our society's values. All learners, staff, hirers and clients have the right to speak freely and voice their opinions. However, freedom comes with responsibility, and free speech designed to manipulate the vulnerable or that leads to violence and harm of others, goes against the moral principles in which freedom of speech is valued.

3. Definitions

An adult at risk is a person who:

- has the appearance of care and support needs and
- is or MAY be experiencing, or is or maybe at risk of, abuse or neglect and
- is unable to protect themselves because of their care and support needs

Definition of Safeguarding: Safeguarding is a term we use to describe how we protect adults and children from abuse or neglect. It is an important shared priority of many public services, and a key responsibility of local authorities. Safeguarding is about protecting certain people who may be in vulnerable circumstances. These people may be at risk of abuse or neglect due to the actions (or lack of action) of another person. In these cases, it is vital that public services work together to identify people at risk, and put steps in place to help prevent abuse or neglect.

Definition of terrorism and violent extremism: There is no universal definition of terrorism but this commonly refers to criminal acts intended to provoke a state of terror in the general public. This covers all forms of terrorism, taking into account causes related to religion, politics and race among others. Violent extremism can be described as the demonstration of unacceptable behaviour by using any means or medium to express views which incite, justify or glorify terrorist violence, seek to provoke others to terrorist acts or foster hatred which might lead to inter community violence in the UK.

Radicalisation is a process by which an individual or group comes to adopt increasingly, extreme, social or religious ideals or aspirations that reject or undermine the status quo and/or undermine contemporary ideas and expressions of freedom of choice (Wilner and Dubouloz, 2010).

Making Safeguarding Personal (MSP) is the approach now taken in all safeguarding work. The key principle of MSP is to support and empower each adult to make choices and have control about how they want to live their own life. MSP focuses on achieving meaningful improvements to people's lives to prevent abuse and neglect occurring in the future, including ways for them to protect themselves. People are individuals with a variety of different preferences, histories, circumstances and life-styles, so safeguarding arrangements should not prescribe a process that must be followed whenever a concern is raised, but instead take a more personalised approach.

The six principles at the heart of our safeguarding from the Care Act 2014 are:

- Empowerment – People being supported and encouraged to make their own decisions and give informed consent
- Prevention – It is better to take action before harm occurs
- Proportionality – making sure what we do is appropriate to the situation and for the individual
- 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 – Accountability and transparency in delivering safeguarding.

An adult at risk who has care and support needs may be:

- an older person
- a person with a physical disability, a learning difficulty or a sensory impairment
- someone with mental health needs, including dementia or a personality disorder

- a person with a long-term health condition
- someone who misuses substances or alcohol to the extent that it affects their ability to manage day-to-day living.

This is not an exhaustive list. In its definition of who should receive a safeguarding response, the legislation also includes people who are victims of sexual exploitation, domestic abuse and modern slavery. These are all largely criminal matters and safeguarding duties would not be an alternative to police involvement, and would only be relevant where a person has care and support needs that mean that they are not able to protect themselves.

People who have care needs are not automatically vulnerable but they may come to be at risk of abuse or neglect at any point due to other factors, including:

- physical or mental ill-health
- becoming disabled
- getting older
- not having support networks
- inappropriate accommodation
- financial circumstances or
- being socially isolated.

It is important to remember that a person is not inevitably 'at risk' just because of their age, frailty or disability. For example, a person with a disability who has mental capacity to make decisions about their own safety could be perfectly able to make informed choices and protect themselves from harm. In the context of safeguarding adults at risk, the vulnerability of the person is related to how able they are to make and exercise their own informed choices free from duress, pressure or undue influence of any sort, and to protect themselves from abuse, neglect and exploitation. It is important to note that people with capacity can also be at risk of abuse or exploitation.

A range of interconnected factors including those associated with their personal characteristics, their situation, environment and social circumstances determines a person's vulnerability. For the purposes of this policy BHCC ACL believes that learners who have English as their second language or low-level literacy and numeracy may also be categorised as 'adults at risk'.

What is the risk?

This policy statement is formulated in recognition that abuse of young people and adults at risk may be widespread, but frequently unrecognised in our society. Abuse can take place in any situation as well as at home. Perpetration of abuse may be by someone in a position of trust, power or authority that uses his or her position to the detriment of the health, safety, or welfare and general well-being of an adult at risk. The person alleged to have caused harm may be a relative, friend or family member, or those charged with a voluntary or professional care role, another service user or a stranger. The prevention of abuse of adults at risk is a collective responsibility of all sections of society. However, we as an educational establishment alongside all agencies, professionals, independent sector organisations and voluntary groups in contact with adults at risk, hold a particular responsibility to ensure safe, effective services and to facilitate the prevention and early detection of abuse from whatever quarter, thus ensuring that appropriate protective action can be taken.

The current threat from terrorism in the UK may include the exploitation of adults at risk to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme

views may also make adults vulnerable to future manipulation and exploitation. This should be viewed as a safeguarding concern.

What is abuse?

The characteristics of abuse can take a number of forms and cause individuals to suffer pain, fear and distress reaching well beyond the time of the actual incident(s). Individuals who have experienced abuse may be too afraid or embarrassed to raise any complaint. They may be reluctant to discuss their concerns with other people or unsure who to trust or approach with their worries. There may be some situations where they are unaware that they are being abused.

Abuse is a violation of an individual's human and civil rights by any other person or persons. It can take a number of forms:

- Physical abuse e.g. hitting, pushing, shaking, inappropriate restraint or neglect
- Sexual abuse e.g. involvement in any sexual activity against his/her will, exposure to pornography, voyeurism and exhibitionism
- Psychological/emotional abuse e.g. intimidation or humiliation; cyber bullying; preventing someone from meeting their religious and cultural needs; enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends; radicalisation
- Financial or material abuse e.g. theft or exerting improper pressure to sign over money from pensions or savings etc
- Modern slavery - human trafficking; forced labour; domestic servitude; sexual exploitation; such as escort work; prostitution and pornography; debt bondage
- Discriminatory abuse - unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Organisational or institutional abuse e.g. failure to respond to identified needs or to respond to complaints
- Neglect or acts of omission e.g. problems and needs being ignored, ignoring or isolating the person, failure to respect privacy
- Self-neglect e.g. Lack of self-care to an extent that it threatens personal health and safety, inability or unwillingness to manage one's personal affairs
- Forced marriage e.g. when someone is pressured into an arranged marriage or forced to marry someone they haven't freely chosen. It can also happen if someone lacks the mental capacity to make their own choices.

What are the indicators of vulnerability towards radicalisation?

- Identity crisis – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society
- Personal crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions of identity, faith and belonging
- Personal circumstances – migration; local community tensions and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of government policy

- Unmet aspirations – the learner may have perceptions of injustice; a feeling of failure; rejection of civic life
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/ reintegration
- Learning support needs – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive nor does it mean that all people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

3b) Signposting of adults who are not at risk

Brighton & Hove's Access Point works with adults who are at risk, or vulnerable [What you can expect from Adult Social Care \(brighton-hove.gov.uk\)](http://brighton-hove.gov.uk) sets this out. They can assist with signposting to other services. The [Health and Adult Social Care directory](#) can be referred to for signposting.

4. Policies, procedures and guidance underpinning BHCC ACL Service safeguarding

BHCC ACL Service is part of Brighton and Hove Local Authority and is required to comply with the Local Authority safeguarding procedures. The Sussex procedures can be found here: <https://sussexsafeguardingadults.procedures.org.uk/>

When in schools and other settings, BHCC ACL service will follow the school or setting is safeguarding procedures.

The procedure for managing allegations is detailed in Appendix A
Staff safeguarding duties and good practice are listed in Appendix B

Roles and responsibilities

- Amir Bahrami/ Adult Learning Manager BHCC ACL Service Leader is the Designated Safeguarding Lead.
- Kirsty Cregan/ Jim Hynes Programme Leads
- Carla Butler Head of Service
- Local Authority Designated Officer(LADO)
 - Darrel Clews (children's lead)
 - Katherine-Taylor-Birnie (adults lead)
- The case manager for dealing with allegations of abuse made against BHCC ACL SERVICE staff members is the Adult Learning Manager. The case manager for

dealing with allegations against the adult learning manager is Carla Butler Head of Skills and Employment.

- The Governance Member responsible for Safeguarding is Carla Butler.

All BHCC ACL service staff know how to recognise signs and symptoms of abuse, how to respond to adults or children who disclose abuse and what to do if they are concerned about an adult or child. They are aware of their responsibility to promote the welfare of adults or child at risk for ensuring that they are protected from harm and to follow the Pan Sussex policies and procedures.

This policy applies to all contact between staff, volunteers and learners, or between learners, as part of a course or learning programme, and to any staff-learner contact in other situations (e.g. tutorials or interviews). It also outlines procedures when staff suspect abuse of an individual outside their involvement with the service.

BHCC ACL Service encourages all staff to be aware of risks of terrorism/radicalisation and to be able to report them appropriately. They are encouraged to consider the risks from terrorism and violent extremism as part of their regular safeguarding responsibilities.

All members of staff and volunteers have a responsibility to be aware of this policy and to report any suspicions or concerns that they might have about abuse or radicalisation to their line manager or the Adult Learning Manager.

The Adult Learning Manager has responsibility to ensure a safe and healthy environment for learning and work. Out of hours, emergency numbers are available to all members of staff and displayed in venues and on-line

There is a designated member of the Governance Board with responsibility for Safeguarding. The Safeguarding Governance Member is responsible for liaising with the Adult Learning Manager over matters regarding safeguarding adults at risk ensuring that:

- policy on Safeguarding and Prevent is reviewed annually
- Each year the Governance Board are informed of what Safeguarding and Prevent training BHCC ACL staff have undertaken that year.

This policy will be communicated to all learners via the Council's website and to all staff through the annual induction process and staff induction.

Adults at risk, child protection and safeguarding procedure

BHCC ACL SERVICE has developed a structured procedure in line with Pan-Sussex Adult and Child Protection and Safeguarding Procedures, which will be followed by all members of the BHCC ACL SERVICE team in cases of suspected abuse. See Appendix A and B.

Concerns about an adult at risk, child or young person must be discussed with the Designated Safeguarding Lead immediately. This will ensure that, if necessary, a referral can be made immediately. The first priority is the welfare of the vulnerable adult or child.

In line with the procedures, Front Door for Families will be notified as soon as there is a significant concern about a child. The Children's Services Threshold Document has been developed so that everyone working with children in Brighton and Hove has a common language for understanding the needs and risks surrounding children and their families. The threshold document does not replace professional judgement, but it is intended to support decision-making and discussions between services and practitioners.

Appropriate records should be maintained for safeguarding concerns. Appendix D provides a form to record of alleged alert and referral report to safeguarding lead.

Safer workforce and managing allegations against staff

BHCC ACL will prevent people who pose risks to children from working in our team, by ensuring that all individuals working in any capacity in our team have been subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2019*.

Where appropriate, all staff members who have contact with children and young people, aged 8 and under, will be informed of their obligation to make declarations in line with Disqualification under the Childcare Act 2006 (updated August 2018).

Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

BHCC have procedures in place to handle allegations against members of staff.

Staff induction, training and development

All new members of staff will be given an induction which includes child protection training on how to recognise signs of abuse; how to respond to any concerns; e-safety and familiarisation with the child protection policy; the schools staff behaviour/code of conduct and the role of the Designated Safeguarding Lead.

The induction will be proportionate to staff members' roles and responsibilities.

The Designated Safeguarding Lead will undergo child protection training when appointed to post, and then refreshed every two years.

All staff members working in school or children's centre settings will undergo child protection training annually (CHECK).

BHCC ACL Service will maintain accurate records of staff induction and training.

Confidentiality, consent and information sharing

It is recognised that all matters relating to safeguarding concerns are confidential.

The Designated Safeguarding Lead will disclose any information about a learner or family to other members of staff on a need-to-know basis only.

All staff members must be aware that they cannot promise learner or child to keep secrets which might compromise their safety or well-being.

All staff members have a professional responsibility to share information with other agencies in order to safeguard adults and children.

All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

The adult learning manager will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent. This is covered in greater detail in Appendix B.

Inter-agency working

The service will develop effective working relationships with other agencies, including agencies providing early help services to adults and children, the police and children's social work services.

Case reviews, other reviews and file audits as required will be attended as set out in the Brighton and Hove Safeguarding Children Partnership (BHSCP).

There is a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

Whistle blowing and complaints

All staff members will be aware of their duty to raise concerns where they exist about the management of safeguarding concerns or cases of risk of radicalisation, which may include the attitude or actions of colleagues. If necessary, they will speak with the team leader or the Local Authority Designated Officer.

There is a clear reporting procedure for learners, children and other people to report concerns or complaints, including abusive or poor practice.

Site security

All staff members have a responsibility to ensure our venues, buildings and grounds are secure and for reporting concerns that may become known.

All visitors and volunteers coming into the BHCC ACL Service classrooms will be identified. Visitors and staff are expected to sign in and out of venues and to display a visitor's badge while on the school or other settings. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

BHCC ACL Service will not accept the behaviour of any individual that threatens the venue security or leads others, adult or child to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site.

On-line safety

Online safety is an integral part of safeguarding.

See Appendix E – to be developed

5. Quality assurance

We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of safeguarding files and records by the Designated Safeguarding Lead.

BHCC ACL SERVICE's senior management will ensure that action is taken to remedy, without delay any deficiencies and weaknesses identified in child protection arrangements.

6. Policy review

This policy and the procedures will be reviewed at the start of every academic year. The next review date is 1st July 2022. The Designated Safeguarding Lead will ensure that staff members are made aware of any amendments to policies and procedures and presented to the Governance Board.

Appendix A: Safeguarding Procedures Including Prevent

To be read in conjunction with the Flow chart of procedures for reporting, reporting and referrals of safeguarding complaint and concerns (To be revised)

1. Role and Responsibility of Staff and Volunteers

Concerns about an adult at risk, child or young person must be discussed with the line manager or Designated Safeguarding Lead immediately. This will ensure that, if necessary, a referral can be made immediately. Early referral gives more time to help an adult at risk or child and family/carers etc before the situation escalates, and allows time for others to protect the adult at risk or child. It is always best to discuss your concerns even if they are unfounded. **Do not ignore concerns. Your first priority is the welfare of the adult at risk or child.**

2. Designated Persons:

Staff/tutors/volunteers will notify the line manager or Adult Learning Manager who will report the safeguarding incident.

Once you have discussed your concerns the safeguarding lead will decide on a course of action or may discuss the matter with the BHCC's adult or children's local authority designated officer or Prevent co-ordinator to decide the course of action.

2a) Reporting a safeguarding concern about an adult at risk

The main point of contact for Adult Social Care is Access Point.

Email: AccessPoint@brighton-hove.gov.uk

Phone: 01273 29 55 55

A form to report a concern for professionals can be found here: [Safeguarding adults at risk form for professionals \(brighton-hove.gov.uk\)](#)

The Local Authority Designated Officer for Adults is Katherine Taylor-Birni.

2b) Reporting a safeguarding concern about a child

A single point of contact for services for children and families, called the Front Door for Families

Phone: 01273 290400

On-Line form: [Contact Front Door for Families online](#)

The Local Authority Designated Officer for children is Darrel Clews.

3. Concerns or allegations about BHCC ACL staff or volunteers

Allegations or concerns about a member of staff must be reported to the Head of Skills and Employment. Our main priority is to assess the situation and allegation first to ascertain whether a referral is required to incorporate the next steps in a Multi-Agency approach. Once the referral has been made then depending on the outcome of any investigation that may be undertaken externally, the concerns or allegations will be

normally dealt with through internal BHCC Human Resources disciplinary policies and procedures. Employees or volunteers working in a position of trust (PIPOT) who may have harmed a child or person with care and support needs, must be referred to the LADO (Katherine Taylor Birnie) and advice sought by the referrer

It may be advisable depending on the situation to suspend contact with the adult at risk or child from any activity that would mean that they have direct contact with the member of staff or volunteer but only if the decision to make a referral has been made.

4. Community Centres, Schools & Early Years Settings or other venues: Any concerns raised whilst you are delivering courses, or assessing candidates, within day centres, schools or early years settings, must be reported immediately to the school or setting's Safeguarding Lead and then to BHCC's Designated Safeguarding Lead.

5. Emergencies: If you are concerned that an adult at risk or child is in immediate danger, please contact emergency services on the following numbers:

- **Police 999**
- **Front Door for Families**
- **Emergency Duty Service – after hours, weekends and public holidays**

6. Disclosure (by an adult at risk, child or third party)

Staff and volunteers should not investigate concerns themselves, as this is the role of the statutory agencies. However, if an adult at risk adult or child does talk to you (Disclosure), it is vital that you listen carefully:

- **Listen** – do not ask closed or leading questions, interrogate or give opinions
- **Do not** promise the adult at risk or child you will keep secrets but thank and congratulate them for coming forward.
- **Tell the adult at risk or child** that you will need to talk to someone else who can help
- **Remain Calm** – Be sensitive and sympathetic. You may feel shocked, angry or upset by what you have been told but if the adult at risk or child senses this, it may prevent them from disclosing
- **Re-assure the adult at risk or child** that they have done nothing wrong. Talk to the adult at risk or child in age appropriate language.
- **Record what you know** - as soon as possible write down what you been told, but not during the disclosure. Make sure you record the facts as soon as the person has left, using the form in Appendix C.

Record of alleged abuse, investigation and report to your line manager or Designated Safeguarding Lead. If necessary a body maps either for the adult at risk or child to indicate where the alleged abuse has taken place or for any visual marks etc. are observed.

- **Report** to the Designated Safeguarding Lead as soon as possible after the disclosure
- **Referral:** Will be made by the designated safeguarding lead persons to the relevant agencies/board/police etc after the internal investigation has taken place and concern is still very much apparent.

7. When to talk to parents/carers

- **Physical Injury:** Where there is obvious physical injury (bruises, black eyes, cuts/bruises) it is appropriate to discuss with the parent/carer. You should always

record your observation and the explanation. However, if you feel the reason given suggest the injury was non-accidental, or a failure to protect the adult at risk or child from harm, the parent/carer should be informed of the need to refer to the Designated Person and/or Social Services.

- **Neglect:** Where neglect or emotional abuse is suspected, you can discuss with the parent/carer sources of support. If concerns persist, you must refer to Social Services via the Designated Person.
- **Sexual Abuse: You must never** approach or discuss suspected sexual abuse with the parent/carer. Immediately inform the Designated Safeguarding Lead who will seek advice from Social Services.

8. Make Written Notes

As soon as possible write down your concerns but not during the disclosure. Record the facts accurately on the forms provided (appendix 3) and give to the Designated Person immediately as this will help to ensure accuracy.

- If physical injuries you may also record on body map diagram
- Disclosure – you must record **what** the adult at risk or child has said not what you think happened. Do not question the adult at risk or child or asked closed questions

9. Confidentiality

It is important that information given, or disclosed, remains confidential and only passed to those persons on a 'need to know' basis.

10. Children Attending Adult Classes/Left Alone (outside classrooms)

Where children do not fit into any of the categories under Policy Statement section 6, it is the right of the Service to ask any parent/carers to leave the class. If children are left in, the setting unsupervised, the line manager will consult the designated safeguarding lead then report the matter to Duty Social Work Team. (Check)

11. PREVENT

BHCC Adult Learning is committed to respond to the challenge of terrorism and radicalisation and the threat the public face from those who promote it.

The service will make every effort to support learners who may be at risk of being drawn into terrorism and radicalisation by referral to appropriate services. We understand that the factors for vulnerability and some of the behaviours that can result.

The member of staff or volunteer making the report should make a written record of the allegation or suspicion of abuse (see the incident template in Appendix C). The line manager will carry out an immediate risk assessment in liaison with the Adult Learning Manager to identify short-term steps required to safeguard the learner while an investigation is conducted.

The Adult Learning Manager and Head of Skills and Employment will assess the level of risk and report concerns to Nahida Shaikh BHCC Prevent Co-ordinator.

Information Sharing

Effective information sharing between organisations is essential to safeguard adults at risk of abuse, neglect, exploitation and radicalisation. This could include statutory and independent sector organisations involved in all aspects of adults safeguarding and Prevent Duty work.

Information will be shared within and between organisations in line with the principles set out below:

- Individuals have a right to independence, choice and self-determination, including the right to be able to have control over information about themselves and to determine what information is shared. Even in situations where there is no legal requirement to obtain written consent before sharing information, it is good practice to do so if possible
- The person's wishes should always be considered, however, safeguarding adults at risk establishes a general principle that information about an incident of suspected or actual abuse can be reported more widely where appropriate;
- Information given to an individual member of staff belongs to BHCC and not to the individual employee. An individual employee cannot give a personal assurance of confidentiality to an adult at risk;
- BHCC should obtain the adult's written consent to share information and should routinely explain what information may be shared with other people or organisations;
- Difficulties in working within the principles of maintaining the confidentiality of an adult should not lead to a failure to take action to protect the adult from abuse or harm;
- Confidentiality must not be confused with secrecy, that is, the need to protect the management interests of an organisation should not override the need to protect the adult;
- BHCC staff reporting concerns at work are entitled to protection under the Public Interest Disclosure Act 1998.

Appendix B: Safeguarding duties for BHCC staff in schools or other settings: A summary of Practice

1. Be aware of BHCC ACL SERVICE safeguarding procedures
2. Make sure you have read the setting's or schools safeguarding policy
3. Be aware of signs of abuse and safeguarding issues listed in Appendix B
4. Always wear your council badge. Schools also ask for additional photo ID for first time visitors (driving licence or passport). BHCC ACL SERVICE can provide DBS details.
5. Sign in and out of BHCC buildings and schools
6. Be aware of expectations re: behaviour and body language
7. Follow mobile phone policies and never use the camera on your phone (CHECK)
8. Be mindful of giving your mobile number and socialising with learners. Keep a professional distance
9. Be aware of iPad policy, particularly photos

10. Be aware of social media policy e.g. do not befriend learners on facebook
11. Talk to children and families about online safety
12. Do not work alone with a child where others cannot see you (CHECK)
13. Signpost families to services that can help
14. Maintain strict confidentiality outside work

Appendix C: Record of alleged alert and referral report to safeguarding lead _ see separate document attached

Appendix C: Record of Safeguarding Concern or incident

Report to Designated Safeguarding Lead

Learner Details Name: Date of Birth: Gender: Address Tel: Email
Courses Learner is currently undertaking Location & frequency
Background information family (if relevant) Present living situation Description of learner's care and support needs (i.e.: why are they at risk)

DETAILS: What is the concern (describe what has happened)

DATE of INCIDENT OR CONCERN:

Who reported it? Where it took place? others involved?

Does the person know you are raising the concern? What are their views?

Any immediate actions you have taken to reduce risk? ie contact police/neighbour

Any relevant conversations?

Signature:

Name/Position:

Date:

DESIGNATED SAFEGUARDING LEAD INQUIRY

Date:

What is the concern that the DSL is looking into?

Summary of DSL inquiry and actions considered or taken? Including identifying risk

Actions taken (referrals?):

Report completed by:

Appendix D: Flow Chart Template (see separate attached document)

Appendix E: On-line safety to be developed

Due to the current challenging circumstances our courses will be taking place online. This will be an opportunity to join in with learning activities with teacher guidance and support at every stage, coupled with some independent learning.

To ensure that all staff and learners are aware of the different expectations and safeguarding responsibilities that will occur in online learning BHCC Adult Learning Service will do the following

- *Online safeguarding will be included in the induction in the first lesson by the tutor*
- *An Online Agreement is in development (CHECK) shared with learners and links to National Cyber Security Centre (NCSC) and Cybersecurity and Infrastructure Security Agency (CISA) advice about learning safely online will be included in the Student Handbook and Tutor handbook*
- *Online safeguarding to be included in Safeguarding reviews*
- *Online safeguarding to be reviewed at annual staff meetings*

Online Agreement

Some basic agreed principles:

- Sessions are private for the members of the group and only group members will be allowed to join.
- Sessions will have clear times and will open and close at those times for members to join.
- Find a quiet space where you can concentrate and fully engage.
- Mute your microphone unless you are speaking.
- Turn off any background noise such as radios or TV.
- If you have any technical issues or other problems, e-mail your teacher and they can send you any information missed.

Agreed values and protocols:

- Information will be confidential to the group, unless it concerns safeguarding in which case it will be shared with the AAL Safeguarding Lead.
- British values of tolerance, mutual respect, individual liberty and the rule of law will be adhered to.
- People will speak one at a time and the teacher will establish a system of asking and answering questions or giving opinions.
- Behaviour and conduct as in face to face to sessions will be expected so no eating, smoking, swearing or states of undress.

Safeguarding, Prevent, Inclusion and Online Safety:

- All participants should feel safe and included in the online learning. If for any reason there is a concern relating to any of these issues, contact your teacher and they will follow the procedures to deal with these issues.

Mitigating the risk - for teachers and managers

Following the National Cyber Security Centre (NCSC) and Cybersecurity and Infrastructure Security Agency (CISA) advice set out below should help mitigate the risk to individuals and organisations from malicious cyber activity related to both COVID-19 and other themes:

- NCSC guidance for the public to help them spot, understand and deal with suspicious messages and emails:

<https://www.ncsc.gov.uk/guidance/suspicious-email-actions>

- NCSC phishing guidance for organisations and cyber security professionals:
<https://www.ncsc.gov.uk/guidance/phishing>

- NCSC guidance on mitigating malware and ransomware attacks:

<https://www.ncsc.gov.uk/guidance/mitigating-malware-and-ransomwareattacks>

- NCSC guidance on home working:

<https://www.ncsc.gov.uk/guidance/homeworking>