

Safeguarding and Prevent Policy

1. General Policy Statement

INTO is committed to, and has a statutory and moral duty to, ensure that each Centre functions with a view to safeguarding and promoting the rights and welfare of children receiving education at each Centre. INTO recognises that safeguarding encompasses the duties of child protection. Safeguarding is also the protection of children and vulnerable adults from involvement with crime and/or terrorism.

It is the responsibility of all Employees to safeguard students.

1.1 Definitions

Safeguarding: protecting children and vulnerable adults from maltreatment, exploitation, harm, or abuse. This can include protection from physical, sexual, or psychological harm. A list of examples of the types of abuse or harm children or adults may encounter can be found in Appendix 1 of this document. Safeguarding is also the protection of children and vulnerable adults from involvement with crime and/or terrorism (see Prevent).

INTO's safeguarding responsibilities comply with statutory requirements and Department for Education advice and guidance, including:

- The Children Act 1989
- The Education Act 2002
- The Education Act 2011
- The Sexual Offences Act 2003
- Keeping Children Safe in Education 2019
- Working Together to Safeguard Children 2018
- Counter Terrorism and Security Act 2015

Prevent: part of the government's anti- terrorism strategy. Higher Education has been identified as a sector where young people may be radicalised. This strand of the anti-terrorism strategy aims to prevent young people getting involved in terrorism.

Children: are those students under the age of 18 up to but not including their 18th birthday.

Vulnerable Adults: adults as defined by section 59 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and/or those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

1.2 Scope

Whilst there is a statutory requirement to safeguard children and vulnerable adults, there is no such requirement for non-vulnerable adults. However, the emphasis at INTO Manchester is of supporting the well-being of the whole student and staff community. With regard to Prevent, INTO Manchester are subject to the UK Government's Counter-Terrorism and Security Act 2015, which requires the organisation to monitor vulnerable students for signs of radicalisation.

The policy applies to all employees, managers, volunteers, contractors and consultants working for INTO Manchester.

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This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and employees. Such policies can be found in the INTO Manchester website, Moodle and are referred to in the Employee Handbook. The Management Committee will have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and employees in each Centre.

1.3 Aims

The main elements and aims of the policy are as follows:

- To promote good practice and raise awareness of child protection issues, including, amongst all INTO employees, managers, volunteers, contractors and consultants in order to provide a safe environment in which all children can learn and develop;
- To prevent young people getting involved in terrorism.
- To promote awareness of the designated safeguarding leads or senior level employees with Child protection responsibility within each Centre, and at Senior Executive/Director level for the Company;
- To provide INTO employees with relevant training in order to make informed and confident responses to specific child protection issues;
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse or radicalisation;
- To ensure that INTO practises safe recruitment in checking the suitability of employees to work with children.

2. Promoting Good Practice – Guidelines

2.1. All employees are encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations.

2.2. All children regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse.

2.3. All children and vulnerable adults have the right to be safeguarded from being drawn into terrorism.

2.4. All employees should treat all students equally with respect and dignity.

2.5. All employees to understand that strong emotions can be aroused by certain child abuse situations. However, it is vital that these feelings do not interfere with one's judgement about the appropriate action to take.

2.6. All employees should work to establish and maintain an environment where children feel secure, are encouraged to talk, and listened to.

2.7. All employees are required to raise concerns about children and vulnerable adults so they can be addressed, and a confidential record established

2.8. All employees have a crucial role to play in identifying welfare concerns and indicators of abuse and neglect at an early stage.

2.9. All visitors must be signed in and out of the Centre and must be escorted when on the premises.

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2.10. All employees have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect, at an early stage.

2.11. All employees should be aware of their duty to raise concerns about the actions or attitudes of their colleagues under the Speak Up Policy (Whistle blowing policy) see Employee intranet INTO.NET (<https://into.ent.box.com/s/ijhznzh7y77vyn9eufwzb/folder/46580515084>). We recognise that children cannot be expected to raise concerns in an environment where employees fail to do so.

2.12. The policy and practice of our Child Protection policy is made with reference to the Government Guidelines “Working Together to Safeguard Children” 2018 and the Counter Terrorism Act September 2015. These guidelines will be adhered to as Best Practice in respect of procedures and responding to any issue. All designated leads will be required to be familiar with the content of this document.

3. Designated Safeguarding Lead

3.1 The designated safeguarding lead with responsibility for child protection issues is the Centre Director.

3.2 The Centre will also have additional senior managers trained to DSL level to act as Deputy DSL in the Centre Directors absence.

3.3 The Centre Director will lead the Safeguarding and Prevent board which will consist of:

- | | |
|--------------------------|---|
| Centre Director | Designated Safeguarding Lead |
| Head of Student Services | Deputy Designated Safeguarding Lead |
| Academic Director | Deputy Designated Safeguarding Lead |
| HR Managers | Safeguarding Board Member (For employee relevant matters) |

Name	Role	Contact Numbers	Email Address
Dawn Abbott	Centre Director	0161 631 1204 / 07894 391 125	dawn.abbott@intoglobal.com
Lucy Thomas	Academic Director	0161 631 1226 / 07824 124 529	lucy.thomas@intoglobal.com
Sion Jones	Head of Student Services	0161 631 1206 / 07770 334 543	sion.jones@intoglobal.com
Christine Atherton*	HR Manager	0161 631 1220	christine.atherton@intoglobal.com
Sharon Page*	HR Manager	0161 631 1245	sharon.page@intoglobal.com

*(HR Manager – employee related matters only)

The board will receive appropriate training and support for their role, and all INTO employees will be made aware of their contact.

3.4 The DSL will take lead responsibility for raising awareness amongst employees within their Centre of issues relating to the welfare of children and young people, Prevent and the promotion of a safe environment within the Centre

3.5 The Safeguarding Board will also be responsible for ensuring the employees in their Centre know how to respond appropriately to situations/issues as they may arise in their Centre and will ensure that their employees are also working in a “safe environment”.

3.6 The Safeguarding Board is responsible for:

- 3.6.1 Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- 3.6.2 Providing advice and support to other employees on issues relating to Safeguarding and Prevent.

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3.6.3 Ensure that employees in the Centre know how to respond appropriately to Safeguarding situations/issues as they may arise.

3.6.4 Maintaining secure storage of all referrals, complaints or concerns, separately from the student file.

3.6.5 Ensure that the parents of under 18-year-old students have access to our Safeguarding and Prevent Policy online.

3.6.6 Liaising with appropriate agencies.

3.6.7 Ensuring that all employees are provided with appropriate training and are aware of the policy and procedures and conduct themselves appropriately including the management committee

3.6.8 Ensuring that all suspicion and allegations of abuse are taken seriously and responded to swiftly and appropriately by the Safeguarding Board.

3.6.9 Ensuring that appropriate safeguarding and prevent risk assessments are undertaken and any issues are addressed by the Safeguarding Board.

3.7 The Safeguarding Board will know how to:

3.7.1. Know how to make an appropriate referral.

3.7.2. Be available to provide advice and support to other employees on issues relating to safeguarding and prevent. By having a DSL available onsite or by telephone.

3.7.3. Have particular responsibility to be available to listen to children and young people studying at the Centre.

3.7.4. Deal with individual cases, including attending case conferences and review meetings as appropriate.

3.7.5. Receive appropriate training and support for this role, on a regular basis in line with best practice within the area of safeguarding.

3.7.6. Ensure appropriate risk assessments are undertaken and any issues are addressed promptly and referred to the Safeguarding Board.

3.7.7. INTO has also nominated the Senior Vice President, UK Operations and Partnerships to take overall responsibility for promoting Safeguarding and Prevent and ensuring that the policy and processes are executed and reviewed appropriately.

4. Procedures for Identifying and Reporting Cases or Suspected Cases

4.1. If a child or young person tells an employee about possible abuse:

4.1.1. Treat the matter seriously and keep an open mind.

4.1.2. Listen carefully and stay calm.

4.1.3. Do not interview the child, although it may be necessary to seek clarity using open questions. DO NOT put words into the child's mouth.

4.1.4. Reassure the child that by telling you they have done the right thing.

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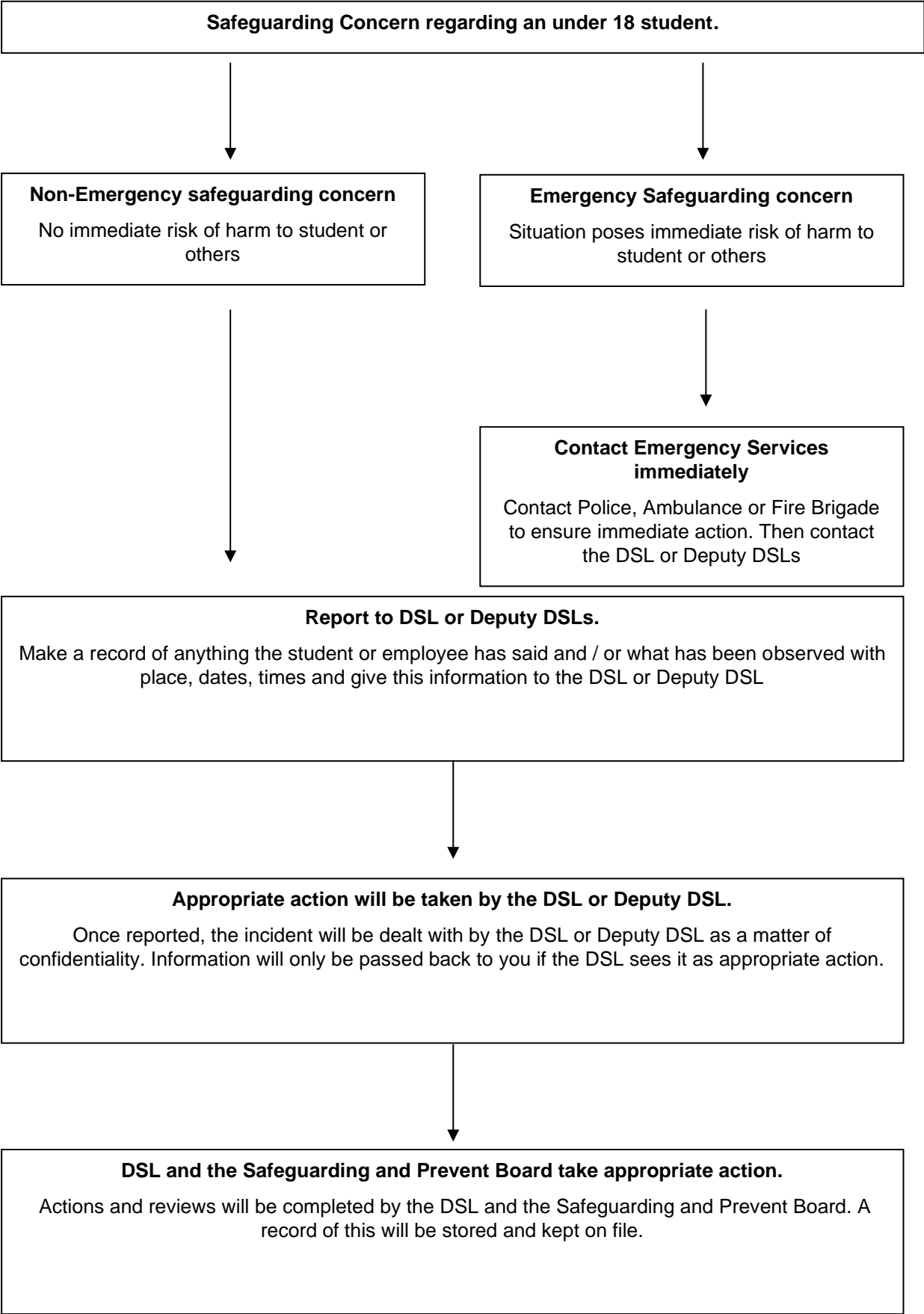
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4.1.5. Inform the child you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.

4.1.6. Note the main points carefully and make detailed notes of the date, time, place, persons present, what the child said and did, what you asked etc. Ensure you sign and date this initial record.

4.1.7. Immediately report to the designated safeguarding lead, or deputies. DO NOT try to investigate concerns yourself and DO NOT tell others about the matter.

Reporting Procedure flowchart



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These procedures describe the response that should be made to any situation where there is knowledge or concern that a student is at risk. They provide employees with information about the steps that they should take if they suspect a student is at risk. (Please refer to appendix 1 for definitions of abuse or harm).

Employees must report any concerns to the Designated Safeguarding Lead or the Deputy Safeguarding Leads.

5. Principles and Procedures

5.1 Employees will not investigate, but will, wherever possible, elicit enough information to pass on to the DSL, in order that they can make an informed decision of what to do next.

5.2 For all non-emergency safeguarding concerns, including Student disclosure, Employees will:

- Take seriously and listen carefully to what is being said, stay calm, getting as clear a picture as possible, but avoiding asking too many questions at this stage;
- Note the main points carefully and make detailed notes of the date, time, place, persons present, and information disclosed by the student;
- Avoid giving promises of complete confidentiality – this will be on a need to know basis in order to help the students;
- Explain that there is duty to tell the DSL, and that their concerns may be shared with others who could have a part to play in protecting them;
- Reassure them that they will be involved in decisions about what will happen, and if possible, try to find out what the student wants to happen;
- Complete the Non-emergency Safeguarding Concerns recording form (appendix 2);
- Immediately report to the DSL

The DSL will then:

- Reassure the person who made the referral and inform them that appropriate action will be taken and that the student is being cared for.
- Make an immediate evaluation of the risk to the student;
- Take reasonable and practical steps to safeguard the student as appropriate;
- Consider referring to the Police if the abuse or neglect suspected is a crime;
- If the matter is to be referred to the Police, discuss risk management and any potential forensic considerations;
- Arrange any necessary emergency medical treatment (note that offences of a sexual nature will require expert advice from the Police);
- Make sure that others are not at risk;
- Follow up on the incident and check the current situation of the student.

5.3 When responding to an emergency safeguarding concern:

- Make an immediate evaluation of the risk and take steps to ensure that the student is in no immediate danger;
- Where appropriate, dial 999 for an ambulance if there is a need for emergency medical treatment;
- Immediately report to the DSL

5.4 Referral of concerns regarding Radicalisation:

- Where an employee has concerns that a student is expressing violent extremist views or is at risk of being drawn into violent extremism, these concerns should be reported immediately to the DSL using the Prevent Concern form (appendix 3)
- The DSL will investigate the matter, seeking to gather together the substantive information and evidence which would allow a full consideration of the case.
- Once any available information and substantive evidence has been gathered, this will be considered by the Safeguarding Board
- A decision will then be made as to the seriousness of the case

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5.5. Reporting and dealing with allegations of abuse against employees:

Once the designated safeguarding lead has received the accusation, they must follow the following guidelines – Working together to Safeguard Children 2018”.

- Assess whether the allegation is serious enough to refer on to local agency/social services.
- DO NOT investigate the matter with the employee, child concerned or potential witnesses.
- Obtain written details of the concern/allegation, signed and dated by the person who received the allegation (not the child/adult making the allegation).
- Countersign and date the written details.
- Record any information about times, dates and location of incident(s) and names of any potential witnesses.
- Record discussions about the child and/or employee, any decisions made, and the reasons for the decision.
- If an allegation requires immediate attention, but is received outside normal office hours, the designated safeguarding lead should consult the Children’s Services emergency duty team or local police and inform the MCC Designated Officer (formerly known as LADO) as soon as possible.
- Refer the case to the MCC Designated Officer within 1 working day. Referral should not be delayed in order to gather information and a failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.
- As soon as possible after an allegation is made or a concern of suitability is raised, the designated safeguarding lead should inform the parent(s) or carer(s) of the child/ren involved, having checked GDPR permissions. The MCC Designated Officer should be consulted first to ensure that this does not impede the disciplinary or investigative processes. In some circumstances, however, the parent(s)/carer(s) may need to be told straight away e.g. if a child is injured and requires medical treatment
- The parent(s)/carer(s) and the child, if sufficiently mature, should be helped to understand the processes involved and kept informed about the progress of the case and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.
- As soon as possible after an allegation has been received, the accused employee should be advised. Human Resources should be consulted at the earliest opportunity in order that appropriate support can be provided for the employee via the organisation’s occupational health or employee welfare arrangements.
- Advice should first be sought from the MCC Designated Officer, police and Children’s Services who may want to impose restrictions on the information that can be provided. However, the principle is that INTO should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body.
- Please refer to the UK Employee Handbook for information relating to relevant processes in the event of an accusation against an employee.

6. Confidentiality

6.1. Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person, where applicable up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

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7. Support

7.1. INTO will work together with Children's Services and/or police, where they are involved, and consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are addressed. INTO will also ensure that our students are not disadvantaged by language limitations and will ensure that an independent interpreter is available as appropriate.

8. Relevant Training and Guidance for INTO Employees

8.1. INTO Manchester will ensure all employees are provided with sufficient training and support in relation to Safeguarding and Prevent

8.2 All Centre employees will receive basic Safeguarding and Prevent training, via either online or face-to-face methods. Key staff will undertake higher level Safeguarding and Prevent training.

8.3 Safeguarding and Prevent training will be updated every 2 years as a minimum, however additional briefings may be provided within this period, driven by changes in legislation or local conditions/circumstances

8.4 The INTO Manchester approach to Safeguarding and Prevent will be covered in the induction sessions for all new employees.

8.5 All employees will receive a copy of this policy and access to other related policies and relevant procedures.

8.6 All employees will have information accessible to them regarding appropriate behaviour and conduct, which is included in the UK Employee Handbook.

9. Safe Recruitment of Employees

9.1. INTO will ensure that as part of its recruitment policy all employees working in the Centres:

9.1.1. Will have appropriate DBS checks PRIOR to the start date as far as is practically possible. In exceptional circumstances the DSL may accept a List 99 check and a satisfactory risk assessment whilst the DBS checks are completed.

9.1.2. Will have been interviewed, and reference checked as far as practically possible to a satisfactory level PRIOR to start date. In the event that this is not possible a risk assessment will be conducted and kept on the employee's file until satisfactory references have been returned.

9.1.3. Will have had their identity checked PRIOR to start date.

9.1.4. Will have seen documentary evidence of their qualifications PRIOR to start date.

9.1.5. All gaps in CVs will be investigated

9.1.6. All offers of employment are conditional upon meeting the above requirements.

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10. Contact Details

INTO Manchester, Bridgewater House, 58-60 Whitworth Street, Manchester, M1 6LT

INTO Manchester reception – 0161 631 1200

INTO Manchester Designated Safeguarding Leads and Deputies

Name	Role	Contact Numbers	Email Address
Dawn Abbott	Centre Director	0161 631 1204 / 07894 391 125	dawn.abbott@intoglobal.com
Lucy Thomas	Academic Director	0161 631 1226 / 07824 124 529	lucy.thomas@intoglobal.com
Sion Jones	Head of Student Services	0161 631 1206 / 07770 334 543	sion.jones@intoglobal.com
Christine Atherton*	HR Manager	0161 631 1220	christine.atherton@intoglobal.com
Sharon Page*	HR Manager	0161 631 1245	sharon.page@intoglobal.com

*(HR Manager – employee related matters only)

Safeguarding - LSCB Contact:

Safeguarding Unit – Greater Manchester

MCC Designated Officer (formerly known as LADO)

Majella O'Hagan

Email: quality.assurance@manchester.gcsx.gov.uk

Phone: 0161 234 1214

MCC Designated Officer Referral Form (Appendix 4)

Prevent Contacts Greater Manchester

Samiya Butt - S.butt@manchester.gov.uk

Prevent Team - 0161 856 6345

Channel Team - 0161 856 6362 Julie Haworth – juliex.haworth@gmp.police.uk

CT.Awareness@gmp.police.uk

Police

Greater Manchester Police Safeguarding Vulnerable Persons Unit

Tel: 0161 856 6411 or 0161 856 5017 or 0161 856 7484

E-mail: publicprotection.division@gmp.pnn.police.uk

Child Protection Team – North Manchester Police Station, Central Park, Northampton Road, Monsall, M40 5BQ – 0161 856 3707

Operating Hours: 07:00 – 20:00

Out of Hours: Emergency – 999 / Non-Emergency but serious concern - 101

Out of Hours Operational Control team – 0161 872 5050

In an emergency ring 999 (or for none urgent concerns 101)

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INTO recognises the following as definitions of abuse:

Physical Abuse - Physical abuse causes harm to a child's person. Physical abuse may involve 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 fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect – Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological need, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, failing to ensure adequate supervision or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.

Sexual Abuse – Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts. They may involve 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.

Emotional Abuse - Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of abuse, though it may occur alone.

Radicalisation - Radicalisation: act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind

Extremism*: holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to Core British values: including

- (i) democracy
- (ii) the rule of law
- (iii) individual liberty
- (iv) respectful tolerance of different faiths or beliefs.

*NB: extremism can refer to a range of views, e.g. racism, homophobia, rightwing ideology, as well as any religious extremism.

Employees, students and other adults (group leaders, homestays etc.) may arrive at INTO Manchester already holding extremist views. Or, whilst attending the centre, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more. People who are vulnerable are more likely to be influenced, their vulnerability could stem from a range of causes, including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, and bereavement.

Appendix 2.

Non-emergency Safeguarding Concerns recording form

This report is to record student incidents that occur at any point of the day but also other incidents that occur in the building

Date	Time	Location
Student / Employee Name(s)	Student Number	Email/Contact number

Incident Summary:

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MCC Designated Officer Referral

Email to quality.assurance@manchester.gov.uk

Referrer Details

Date of referral:

Person Name:

Referrer Position:

Referrer Service:

Telephone no:

E-Mail Address:

Subject Adult

Full Name:

Date of Birth:

Gender:

Address:

Disabled:

Employment Sector:

Name, Address & Tel No. for the Employer / Approving Agency:

Occupation / Job Title / Role:

Workplace Address:

Employment Start Date:

Reason for Referral:

Any other Role with Children:

Child Details:

Name	Date of Birth	Reason for Contact

Actions taken by employer to date:

Alleged Victim(s)

Child's details if Applicable:

Name	Date of Birth	Gender	Ethnicity (if known)	Disabilities (if known)	Address	Legal Status and whether looked after child	Details of Parents/ Guardians

Date of Incident:

Brief Description of allegation or concern:

Any other professional involvement:

Email to quality.assurance@manchester.gov.uk

(Version August 2019)

Policy Acknowledgement Statement

By signing the below, I confirm that I have read the INTO Manchester's Safeguarding and Prevent Policy in its entirety.

I confirm that I have understood and confirm the below:

- I am aware of who the Designated Safeguarding Lead (DSL) and the Deputy Safeguarding Leads are for INTO Manchester and how to contact them.
- I understand that it is everyone's responsibility to ensure the safeguarding of all under 18 students who study at INTO Manchester.
- That I have a legal duty to report any safeguarding concerns that I have to the DSL or Deputy DSLs as quickly as possible.

Employee Name:

Department:

Signature:

Date: