



Forward 2 Employment

# Safeguarding Policy

2019

Manager responsible for policy:  
Directors and Trustees

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## Statutory Guidance:

The Care Act 2014 place a statutory responsibility and duty upon Local Authorities and their partners to ensure that provision is made for the safeguarding of all adults, especially those that are considered vulnerable.

Kent and Medway Safeguarding Adults Board has published a Multi-Agency Adult Protection Policy, which is available in PDF format on their website.

This policy has been written following consultation of the Care Act (2014), and the Kent and Medway Safeguarding Adults Board's Adult Protection Policy; a copy of which is available from either Medway or Kent's Adult Safeguarding Boards website.

## Our Mission:

Forward 2 Employment (F2E) aims to be a community dedicated to enhancing individual development, founded on high professional standards, mutual trust and respect for the essential worth and human dignity of all its members.

## Introduction/Definitions:

### Vulnerable Adults

Who is a vulnerable adult?

"Vulnerable adult" is a term used to describe a person who is:

- An adult (aged 18 years or over) and,
- is, or may be, in need of community care services because of frailty, learning or physical disability, sensory impairment or mental health difficulty, and/or
- is, or may be, unable to take care of him or herself or take steps to protect him or herself from significant harm or exploitation.

### Types of Abuse:

#### Domestic abuse

Controlling and coercive behaviour, forced marriage, female genital mutilation or honour based violence.

#### Discriminatory abuse

Ill-treatment or harassment based on a persons' age, sex, sexuality, disability, religious beliefs or ethnic group – disability hate crime.

#### Financial or material abuse

Financial scams (in person, on line, by post or telephone); theft; fraud; coercion over wills; misuse of someone's money, property or other belongings without their agreement.

#### Institutional abuse

Through rigid regimes, systematic poor care; poor organisational culture; lack of resources; denial of choice; lack of dignity and respect for service users.

#### Physical abuse

Hitting; burning; pushing or kicking someone; rough handling; unreasonable restraint (including misuse of medication); locking someone in a room.

#### Neglect or acts of omission

Neglect or acts of omission by people responsible for giving care including; ignoring medical, emotional or physical care needs; failure to provide access to the appropriate

health, care and support or educational services; withholding necessities of like such as medication, adequate nutrition and heating.

### **Sexual abuse**

Rape; inappropriate touching; forcing or grooming someone to take part in or witness any sexual act against their will.

### **Psychological or emotional abuse**

Intimidation; bullying; shouting; swearing; taunting; threatening or humiliating someone; grooming; manipulation; or inciting someone to carry out a criminal or terrorist acts.

### **Self-neglect**

Neglecting to care for oneself or environment.

### **Slavery**

Trafficking; forced labour and domestic servitude.

The health, safety and well-being of all our young adults are of paramount importance to all the staff who work in our provision. All adults have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our provision including their intern placements.

In our provision we respect our adults. The atmosphere within Forward 2 Employment is one that encourages all adults to do their best. We provide opportunities that enable our interns to take and make decisions for themselves.

We recognise that abuse and neglect can result in underachievement. We strive to ensure that all our adults make at least good progress.

## **Aims**

The purpose of this policy is to ensure that all our staff are clear about the actions necessary with regard to an adult protection issues.

Our aims are:

- To raise the awareness of all staff, and to identify responsibility for reporting possible cases of abuse;
- To ensure effective communication between all staff on adult protection issues;
- To set down the correct procedures for those who encounter an issue of adult protection.

## **Procedures**

There is a named person in our provision who is the Designated Safeguarding Lead (DSL). they are supported by a deputy. The Safeguarding team is guided by two principles:

- In accordance with the Human Rights Act (1998), each and every individual has the right to liberty and security; Article 5, 1.
- Confidentiality should be respected as far as possible.

A key role of the coordinator is to be fully conversant with the procedures of the Kent and Medway Safeguarding Adults Board (K/MSAB) and to ensure that the provision takes action to support any adult who may be at risk. The coordinator must also make sure that all staff, directors and trustees are aware of their responsibilities in relation to adult protection.

David Waters is the Designated Safeguarding Lead (DSL)  
Elizabeth Halton is the Deputy Designated Safeguarding Lead (DDSL)

If anyone suspects that any intern may be a victim of abuse, they should not try to investigate, but should immediately inform the named person (see above) about their concerns and log this on the correct account on the Safeguarding Software system. Staff must not keep to themselves any information about abuse which an adult gives them; they are required by law to pass this information on.

We regard all information relating to individual adult protection issues as confidential, and we treat it accordingly. We pass information on to appropriate persons only. Appropriate persons may include the Medway ADULT Protection Team (where appropriate).

**Telephone:** 01634 334466 for a consultation

**Online:** Complete an Adult Social Care Alert Form on the Medway Safeguarding Board's website

We require all adults seeking employment at this college to have their application vetted by the police and have a rigorous processes of safeguarding/right to work in place in order to ensure that there is no evidence of offences involving the abuse of children or adults.

All adults in the provision receive regular training to raise their awareness of abuse and their knowledge of the adult protection procedures that have been agreed locally.

All the adults in our college share responsibility for keeping our interns safe. We may on occasion report concerns which, on investigation, prove unfounded.

## Confidentiality

Staff members must never promise absolute confidentiality to anyone where there are concerns about abuse. They can guarantee that they will only pass the information to the minimum number of people necessary to ensure that appropriate action is taken. Where a vulnerable adult expresses a wish for concerns not to be pursued then this should be respected whenever possible. However, decisions about whether to respect the person's wishes must have regards to the level of risk to the individual and/or others and their capacity to understand the decision in question and to make decisions relating to it. Any decision taken not to proceed with a referral to another agency and the reasons must be recorded in line with the Mental Capacity Act (2005).

## Monitoring and Review

The trustees regularly monitors and reviews any incidents detailed.

This policy is reviewed annually by the trustees.

## Summary

Forward 2 Employment is committed to the highest standards in protecting and safeguarding the young adults entrusted to our care.

Our provision will support all adults by:

- Promoting a caring, safe and positive environment within the provision
- Encouraging self-esteem and self-assertiveness

- Effectively tackling bullying and harassment

We recognise that some adults may be the victims of abuse and that staff working with adults are well placed to identify such abuse.

At Forward 2 Employment we aim to:

- Create an atmosphere where all our adults can feel secure, valued and listened to
- Recognise signs and symptoms of abuse
- Respond quickly, appropriately and effectively to cases of suspected abuse

**Any concerns regarding staff members abusing learners should be reported in line with the Whistleblowing policy and the Safeguarding Policy.**

## APPENDIX 1

### COVID-19 (Coronavirus) Policy

Like many other providers Forward2Employment finds itself working in a very different way during these unprecedented times. The DfE has produced advice and guidance for schools, academies, and colleges and these form the update to this policy.

Whilst the Government article published on the 27<sup>th</sup> March 2020 entitled [Coronavirus \(COVID-19\): safeguarding in schools, colleges, and other providers](#) is guidance, this document is Forward2Employment's Safeguarding Policy and must be adhered to. It has been updated using the relevant sections of the aforementioned guidance.

### Role of the Local Authority

The Department for Education is working very closely with all local authorities to ensure that children of critical workers and vulnerable children can, where required, attend a school or college. The department will, via regional school commissioners, continue to support local authorities' crucial responsibilities in maintaining effective safeguarding and adult protection services in this challenging time to ensure schools and colleges can access the support they need.

### Safeguarding and Clusters

Currently F2E is closed. The employers offering the internships have closed down to non-essential workers. This means that there is no provision for the interns at F2E. There has yet to be any request for Critical Worker Support of these young adults. Due to their age and the fact that F2E is a Specialist Post 16 Institution catering for young adults between the ages of 19-25 it is not appropriate nor permitted for them to attend other educational establishments. For example they could not access support with the other Critical Worker students back at Bradfields.

Staff that are providing support through regular contact with interns should continue to use the same safeguarding procedures that they do on a normal working day. The principles of adult safeguarding must still apply.

Should staff find that the local arrangement becomes one where they are required to work in a hub, or cluster of schools with students of secondary school age then the principles of keeping Children Safe in Education must be adopted by the host institute. Staff must familiarise themselves with the safeguarding procedures put in place by that particular institution. Staff should refer to a copy of the Bradfields Safeguarding policy to re-familiarise themselves with safeguarding procedures should this happen.

F2E will not re-open as a hub for other students, but in the event that Bradfields becomes the hub and hosts students from other provisions, staff may be redeployed to work there. In this circumstance reporting of safeguarding issues will become paper based. Forms will be available in the staffroom and should be passed to the DSL or Deputy DSL on site. If unavailable they should be passed to a member of the Senior Leadership Team. Further details will be published if a hub arrangement is set up.

Should cluster arrangements be entered into all utilised staff must be appropriately checked and risk assessed.

## **Principles of Keeping People Safe in Education**

The way education providers are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of important safeguarding principles must remain the same:

- with regard to safeguarding, the best interests of students must always continue to come first
- if anyone in an education setting has a safeguarding concern about any student they should continue to act and act immediately
- a DSL or deputy must be available – If this is not physically on site then procedures on who and how to contact must be clear.
- it is essential that unsuitable people are not allowed to enter the student's workforce and/or gain access to vulnerable students
- vulnerable adults should continue to be protected when they are online

Schools and colleges should, as far as is reasonably possible, take a whole institution approach to safeguarding. This will allow them to satisfy themselves that any new policies and processes in response to COVID-19 are not weakening their approach to safeguarding or undermining their safeguarding policy.

## **F2E Safeguarding Policy**

The policy will continually be reviewed throughout the COVID-19 pandemic and any updates will be made within this section (Appendix 1). The policy will, wherever practically possible be reviewed in conjunction with the DSL or a member of the safeguarding team.

### **Updates from Safeguarding Partners (Local Authority, Police, Health)**

The Job Coaches and the Wider Pastoral Team are checking, and will continue to check in, with interns, families and where applicable Social Workers of interns that are on roll at F2E.

A daily record of closure of F2E is provided to the DFE.

### **Local Authority Advice – Vulnerable Students**

As all F2E interns have an EHCP and are potentially vulnerable the advice surrounding these young adults remains the same as in the main body of this policy. Referrals to the Local Authority Safeguarding Board are carried out in the same way as previously, through the [Medway Safeguarding Children Partnership](#) webpage.

Information sharing during any lock down periods must be maintained.

### **Reporting Procedures for Staff**

All staff and volunteers have a duty to safeguard the interns and report any concerns that they have. This action must be taken in a timely manner.



All concerns should be raised by email to [david.waters@fortistrust.co.uk](mailto:david.waters@fortistrust.co.uk) or [elizabeth.halton@fortistrust.co.uk](mailto:elizabeth.halton@fortistrust.co.uk). This must be sent from your works email address as this will provide encryption end to end without having to use egress or any other encryption package. If you have to send it from a personal email account then write the concern in Word and password protect it using the surname (with a capital letter) of the intern concerned.

In the event that the DSL and DDSL is unavailable then concerns can also be raised with Emma McGregor Davies who will be able to advise and refer on if necessary. Her email is [emma.davies@fortistrust.co.uk](mailto:emma.davies@fortistrust.co.uk).

## **The DSL and Deputy DSL**

The DSL remains David Waters ([david.waters@fortistrust.co.uk](mailto:david.waters@fortistrust.co.uk))

The Deputy DSL remains Elizabeth Halton ([elizabeth.halton@fortistrust.co.uk](mailto:elizabeth.halton@fortistrust.co.uk))

Wherever possible there will be a member of the safeguarding team (trained to DSL level) on the Bradfields academy site when they are open. When not on site the safeguarding leads will monitor the emails from safeguarding leads within social care, the local authority and from staff.

## **Looked After Students**

The advice from Government and the Local Authority is that Looked After Interns should be at home with their carers.

## **Supporting Vulnerable Students**

Whilst many young adults are at home during the response to Covid-19 F2E will still offer support. The Job Coaches and Wider Pastoral Team are in contact with the interns that they regularly work with.

The therapy team are also available for new referrals through email during this time. Their details are published on the Bradfields website for families that are struggling. This service is currently available across the trust, which F2E can also access.

If staff have a concern about any member of staff or volunteer they should follow the guidance within this policy. In the first instance they should talk to the DSL or DDSL. If it involves both of these then they should report their concerns to the CEO of Fortis Trust.

## **Online Safety**

With more interns accessing learning materials at home, the chance for online activity is increased. Staff and parents must be aware of what interns are accessing. Any reports of breaches in online safety should be passed to the DSL or DDSL who will assess and report in the usual way. In addition a referral to [CEOP](#) will be made.

## Designated Safeguarding Leads (DSLs and DDSLs)

Whilst open the trust will endeavour to always have a trained member of safeguarding staff available. Currently those that have undergone safeguarding training at the appropriate level are:

- David Waters – DSL
- Elizabeth Halton – DDSL
- Marie Sweetlove
- Emma McGregor Davies

Should it not be possible for one of these members of staff to be present then a nominated member of the Senior Leadership Team will liaise with the DSL or DDSL.

## Vulnerable students

The following is quoted directly from the DfE Guidance page:

'Ensuring that vulnerable students remain protected is a top priority for the government. Vulnerable students include those who have a social worker and those young people up to the age of 25 with EHC plans, read more in the [guidance on vulnerable children and young people](#) for further information.'

Senior leaders, especially DSLs (and deputies) know who their most vulnerable students are and have the flexibility to offer a place to those on the edges of receiving children's social care support.

School and college staff should continue to work with and support social workers to help protect vulnerable children. This will be especially important during the COVID-19 period.'

F2E continues to emphasise that the safest action for interns is to remain at home, but where this is not possible, a supervision placement will be made available, providing that the student does not have underlying medical conditions that could place staff and interns at risk.

## Attendance

Attendance registers in educational settings are not being taken. The F2E provision is marked as "Closed – Staff and students not required to attend."

The provision will agree with families and social workers whether an intern should be in attendance if a place is requested. Once this agreement is in place then the provision will follow up on any intern they were expecting to be in attendance. If there is a social worker in place then the academy will ensure that Social Care know of the absence.

F2E will ensure that the daily attendance forms are returned to the DfE and to Medway each morning should this become necessary. There will also be daily liaison with Medway Social Care over general attendance.

The Job Coaches and the Wider Pastoral Team will make regular contact with all the interns. This will initially be done through a telephone call. If this is unsuccessful then Social

Workers will be informed. If contact is still unsuccessful then a home visit will be considered in discussion with SLT.

## **Staff Training and Safeguarding Induction**

Staff must now take this opportunity to re-read this policy. If their training is close to expiry then they must redo their training through the online portal.

Whilst attendance at work is on a rota and there is additional time working from home within a week, staff must also re-familiarise themselves with Keeping Children Safe in Education Part 1 (for all staff) and the whole document for those Middle Leaders and above.

Both these documents are in the Must Read Document Centre on the online portal.

## **Students Moving to Other Settings**

Currently F2E does not have interns attending different educational settings for a placement during the week.

Procedures are in place should a student leave the provision. If we know where they are transferring then contact with the academy and local SEN team will be made. Arrangements for file transfer will be made at this point.

Should an intern leave and a destination is not known then Medway SEN team will be alerted and a CME form will be completed.

## **Safer Recruitment/Volunteers and Movement of Staff**

It remains an utmost priority that any person who is unsuitable is not allowed access to the interns.

Should F2E be required to recruit new staff during the Covid-19 pandemic then the same Safer Recruitment procedures will be adhered to as in all other recruitments. The provision recognises that there have been some changes made to the DBS process to minimise face to face contact.

Should the provision need to utilise volunteers then the same checking and guidance procedures that are always undertaken will still be undertaken along with appropriate risk assessments. Please see volunteering policy for more detail. Volunteers who have not been DBS checked will continue to wear an orange lanyard and will not be left unsupervised with any of the interns.

Should staff that are already undertaking regulated activity be required to move location (either to Bradfields or another provider) they will not be required to undertake a new DBS check. F2E will ensure that the correct checks have been carried out on all staff being moved to and from the provision.

Forward2Employment will continue to follow paragraph 163 of KCSIE which outlines the details for referring anybody who has harmed or poses a risk of harm to a child or vulnerable adult.

It is essential that during the pandemic F2E and Fortis Trust are aware of which staff and interns are expected each day and that all necessary checks have been completed on the staff. As such the Single Central Record will continue to be maintained throughout this time.

## Mental Health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of interns and their parents. Staff should be aware of this in setting expectations of interns' work where they are at home. The department is providing separate guidance on providing education remotely.

Should F2E staff become concerned about an intern or their family then members of the Wider Pastoral Team are available for advice, guidance and intervention. The available therapists are:

- Julie Burton: [julie.burton@fortistrust.co.uk](mailto:julie.burton@fortistrust.co.uk)
- Justine Staley: [justine.staley@fortistrust.co.uk](mailto:justine.staley@fortistrust.co.uk)

Staff members are also welcome to contact either Julie or Justine should they feel the need to.

All employees of F2E are automatically members of the Employee Assistance Programme and can access support from them directly on 08000 856 148 or through their online resources at:

[www.edsupport.org.uk/onlinesupport](http://www.edsupport.org.uk/onlinesupport)

Username: worklifesupport      Password: support11

This service is available 24/7

F2E employees can also access Care First by telephoning 0800 174 319 for emotional support from the Information Team. This service is available Monday – Friday 8am – 8pm.

## Online Safety

It is difficult to help monitor interns online activity if they are working from home. This responsibility will fall in the main to parents and carers. F2E staff will support with this by ensuring:

- Work set online is posted on the F2E website
- Any websites that are recommended have been tested first
- Any work sent by email is sent from a work email and never a personal account. A copy of any correspondence should be kept.

Additional support and guidance can be found at:

- [guidance on what "appropriate" looks like](#)
- [UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves](#) that any new arrangements continue to effectively safeguard children online.
- The [UK Safer Internet Centre's professional online safety helpline](#)

## Interns and Online Safety Outside of the Academy

Whilst many interns are working away from the provision staff are reminded of the other policies relating to their working practices. All staff have signed The Acceptable Use of IT Policy, and are reminded of the sections governing intern and parent contact.

If an online session is being delivered and concerns for an intern welfare are raised then staff should follow the existing safeguarding reporting procedures.

Whilst we await further guidance around online learning. Some useful links are:

- [guidance from the UK Safer Internet Centre on safe remote learning](#)
- [London Grid for Learning on the use of videos and livestreaming](#)

Young adults who are being asked to work online must have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school or college this should also signpost the young adults to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Further support for parents and carers can be found at:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers