National Star
Realising the aspirations of people with disabilities

Senior Manager Responsible	Reviewed by	Approved by	Date approved	Next review date
Lynette Barrett	Marina Wheale Sept 2025	Governors' Committee	October 2025	September 2026

Working with National Star
Safeguarding Policy (Wales)

1. About this Policy

1.1 This Policy should be read in conjunction with the National Star Safeguarding Procedures and links to the following policies, guidance and legislation:

- Recruitment and Selection Policy
- Disciplinary Policy
- Whistleblowing Policy - Whistleblowing Advice Line 0800 028 0285
- Anti-Bullying Policy
- Complaints Policy
- Health and Safety Policy
- Mental Capacity Act Policy
- Technology & Social Media Acceptable Use Policy
- Guidance on Safer Working Practice
- Person Missing or Absent from Education Protocol
- Prevent Risk Assessment
- Prevent Procedure
- Safeguarding Children in education: handling allegations of abuse against teachers and other employees (2014)
- Modern Slavery Act statement

1.2 This document sets out National Star policy on responding to concerns regarding the safeguarding and protection of children and young people aged under 18 years and adults at risk of neglect or abuse. The policy and the associated procedures provide guidance to all employees who may have concerns of this nature within the context of their work.

National Star is a working name of National Star Foundation which is registered in England and Wales, company number 00522846, charity number 220239. Registered office Ullenwood Manor, Ullenwood, Cheltenham, Gloucestershire, GL53 9QU

1.3 This Policy fulfils the requirements of:

- Health and Social Care Act (2012)
- Social Care & Wellbeing (Wales) Act (2014)
- The Children Act 1989 and (2004)
- The Protection of Children Act (1999)
- The Sexual Offences Act (2003)
- The Human Rights Act (1998)
- Mental Capacity Act (2005)
- Working Together to Safeguard People Guidance (Wales) (2022)
- Care Act (2014)
- Safeguarding Vulnerable Groups Act (2006)
- Equality Act (2010)
- Deprivation of Liberty Safeguards (2009)
- The All Wales Safeguarding Procedures (2019)
- Children and Families Act (2014)
- Keeping Learners Safe (2022)
- Safeguarding Children in Education (2014): handling allegations of abuse against teachers and other employees
- Prevent Duty Guidance (2023)
- Safeguarding Children, Working Together under the Children Act (2004)

2. Scope

2.1 This policy applies to all employees, Governors, Trustees, volunteers and service users. Employees from other organisations working with people on our premises or with college learners or National Star residents will also be expected to follow this policy.

3. Statement

3.1 National Star regards the protection of children and adults at risk, including online, as a priority and is committed to safeguarding these groups.

3.2 The principles of this policy are as follows:

- The protection of children, young people and adults at risk is everyone's responsibility. Employees should not assume someone else will take action.
- National Star will follow statutory and specialist guidelines in working with children, young people and adults (service users) at risk.
- This includes children, young people and adults from outside of National Star who are using our settings.
- National Star will seek to support all those affected by abuse.
- National Star will seek to prevent vulnerable people from radicalisation or undue influence that may cause harm to themselves or others.
- National Star will review its Safeguarding Policy annually.
- Ensuring all service users know who they can approach in the organisation if they are worried or in difficulty.

4. Review

4.1 This policy is available on the National Star intranet.

4.2 This Policy will be reviewed annually by the Head of Safeguarding to respond to changes in legislation and current practice and the outcome of reviews undertaken by the Safeguarding Operational Group and Safeguarding Strategy Group.

4.3 This policy will be presented to the Governor's Committee every year.

Appendix 1

5. Additional Information

5.1 National Star recognises its duty to safeguard service user's encompasses specific safeguarding issues including child sexual exploitation (CSE), child criminal exploitation (CCE), child on child abuse, sexual harassment and sexual violence, Female Genital Mutilation (FGM) forced marriage, radicalisation, mental health, upskirting, and the importance of online safety including the sharing of nude and semi- nude images and videos.

5.2 Where there is a safeguarding concern, service users wishes and feelings will be considered (where appropriate) when determining what action to take and what services to provide.

5.3 All concerns, including **low level** concerns (that do not meet the threshold for harm), will be treated seriously and investigated appropriately.

5.4 The Chair of Governors will liaise with the local authority on safeguarding issues in the event of an allegation being made against the Chief Executive.

5.5 The Head of Safeguarding is the Designated Safeguarding Lead (DSL), this also covers the duties of the Designated Safeguarding Person (DSP). The DSL/P has overall responsibility for safeguarding within the organisation. The organisation's Director of Services for Long-Term Living residents and Day students acts as the Deputy Designated Safeguarding Lead/Person (DDSL/P).

5.6 National Star also employs a Safeguarding Practitioner and Safeguarding Co-ordinator, both of whom provide advice and support to other employees on welfare and safeguarding matters. During core working hours the DSL/P, DDSL/P Safeguarding Practitioner or Safeguarding Co-ordinator will be available. Outside of these hours all safeguarding concerns should be reported to the on-call manager.

5.7 Employees who have concerns about a service user should raise these with the DSL/P, DDSL/P Safeguarding Practitioner or Safeguarding Co- ordinator, who will decide whether to make an alert to the Local Authority Safeguarding Team. However, any employee member can refer their concerns about a child or adult at risk to the relevant service directly. Where an allegation or suspicion of abuse has been reported to the relevant Local Authority Safeguarding Team, National Star will work in partnership with them to determine the next steps.

5.8 Should a referral to any Local Authority (including social care) be made in respect of serious safeguarding concerns (in respect of all service users up to the age of 18, and high needs service users aged 18 to 25), the DSL/P shall ensure the ESFA are notified that a referral has been made.

5.9 Should a referral be made regarding an individual service user for the purposes

of determining whether that service user should be referred to a panel for the

carrying out an assessment under section 36 of the Counter-Terrorism and Security Act (2015) of the extent to which that individual is vulnerable to being drawn into terrorism, the DSL/P will ensure the ESFA are notified that a referral has been made.

5.10 The police will be contacted where a safeguarding concern could lead to potential willful neglect or ill treatment of someone who lacks capacity. This includes all concerns around care and support needs.

5.11 Any service user that raises or is involved in a safeguarding concern who has capacity, will be offered appropriate support to decide whom they wish to be informed (i.e. family or carers).

5.12 In the event of a safeguarding concern, families and carers of service users who lack capacity will be contacted at the earliest, most appropriate time - unless the family member or carer is directly implicated in the concern. Communication with families and carers will be regular, open and transparent.

6. Deputyship

6.1 Where a family member or carer holds Deputyship i.e. Health & Welfare / Property and Affairs for a National Star service user, relevant information in accordance with the appropriate authorisation and terms of the order will only be provided at the prior request of the Deputy.

6.2 National Star should not have direct access to client funds such as receiving benefits/pension or any other sort of income. The organisation recognises that the Deputy is the only person legally authorised to directly manage service user funds.

6.3 Where National Star is left with service user funds to provide personal allowance for the service user, the organisation will clearly document the use of these funds and provide relevant information as and when requested by the Deputy, so they are able to present a clear annual report to the Office of the Public Guardian.

7. Early Help

7.1 Early Help will be achieved through Personalised Learning Coordinators / Tutors engaging with a range of agencies to coordinate Education Health Care plans /S140 (Wales) or where a child may be at risk of modern slavery, being radicalised or exploited, or if a young carer is showing signs of being drawn into anti-social behaviour, including gang involvement and association with organised crime groups. National Star will engage other services where necessary.

8. Child-on-Child Abuse

8.1 In line with the All-Wales Safeguarding Procedures, National Star has a duty to protect service users against child-on-child abuse. There are many forms of abuse that can occur between children, such as physical abuse, sexually harmful behaviour/sexual abuse, sexual harassment and sexual violence, bullying (including banter), cyber bullying, sexting, up skirting initiation/hazing and prejudiced behaviour.

8.2 All concerns around child-on-child abuse must be reported to the Safeguarding Team.

8.3 Where appropriate, the Local Authority Safeguarding Team and the funding authority will be notified.

8.4 National Star will exercise care in the appointment of all those working with children, young people and adults at risk, working to 'Keeping Learners Safe' by ensuring that everyone working with children and adults at risk:

- Has undergone pre-employment checks in line with current legislation including an appropriate Disclosure and Barring Service check.
- Is adequately trained and supervised.
- Understands and follows the National Star Safeguarding Policy and Procedures.
- Understands and follows National Star Safer Working Practice Guidance.
- Understands the Prevent Procedures.
- Is registered with their relevant professional body (if appropriate).

8.5 All employees, including volunteers, will undertake safeguarding training on a regular basis and demonstrate their knowledge in their practice.

8.6 All employees working within National Star will attend Prevent Training and embed the strategy into their everyday work.

8.7 National Star will promote safeguarding through improving service knowledge of their own safety, and by ensuring they are and feel safe.

8.8 National Star has a zero-tolerance approach to child-on-child abuse. It is recognised that even if there are no reported cases, this does not mean it is not happening within the organisation.

9. **STOMP** (Stopping over medication of people with learning disabilities, autism, or both)

9.1 As a care provider who administers psychotropic medication to people with a learning disability, autism, or both, we adopt the STOMP health care pledge:

- We will actively explore alternatives to medication.
- We will ensure people with a learning disability, autism, or both, of any age and their circle of support are fully informed about their medication and are involved in decisions about their care.
- We will ensure all staff within the organisation have an understanding of psychotropic medication including why it is being used and the likely side effects.
- We will ensure all people are able to speak up if they have a concern that someone is receiving inappropriate medication.
- We will maintain accurate records about a person's health, wellbeing and behaviour.
- We will ensure that medication, if needed, is started, reviewed and monitored in line with the relevant NICE guidance.
- We will work in partnership with people with a learning disability, autism or both, their families, care teams, healthcare professionals, commissioners and others to stop over medication.

9.2 Any concerns in relation to the over-medication of service users should be reported to the Safeguarding team.

10. Roles & Responsibilities

10.1 National Star's Board of Governors is responsible for the implementation and supervision of this policy. A nominated member of the Board will lead on safeguarding and the Board will receive regular reports on safeguarding matters.

10.2 All safeguarding procedures will be implemented by all employees and volunteers.

10.3 The Safeguarding Operational Group will undertake a review of safeguarding cases.

10.4 The Safeguarding Strategy Group will undertake a review of safeguarding practice.

10.5 The DSL/P and Designated Senior Managers (where appropriate) will be responsible for investigating any safeguarding concerns reported at all services except those in Wales.

10.6 For services in Wales, operational safeguarding issues will be the responsibility of the nominated Safeguarding Co-ordinator at the service location, in liaison with the DSL/P or Deputy DSL/P

11. Support, Advice and Communication

11.1 Information and advice regarding this policy can be obtained from the DSL/P

11.2 Employees requiring personal support due to a disclosure or investigation will receive support from the Human Resources department.

11.3 This policy is available on the National Star intranet.

Appendix 2:

12. Preventing Extremism & Radicalisation Procedure

12.1 Introduction

National Star is committed to providing a secure environment for service users where they feel safe and are kept safe. All employees at National Star recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for service users or not.

National Star's Preventing Extremism and Radicalisation Safeguarding procedure also draws upon the guidance contained in the 'Keeping Learners Safe' guidance. The document also considers advice from the Government's 'Prevent Duty Guidance for England and Wales'.

12.2 National Star Ethos and Practice

When operating this procedure National Star uses the following accepted Governmental definition of extremism which is:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'.

There is no place for extremist views of any kind in our organisation, whether from internal sources – service users, employees, or external sources. Our service users see our organisation as a safe place where they can explore controversial issues safely and where our employees encourage and facilitate this – we have a duty to ensure this happens.

As an organisation we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for our service users and so should be addressed as a safeguarding concern as set out in the National Star Alerter flow chart. We also recognise that if we fail to challenge extremist views, we are failing to protect our service users.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of our service users. Education is a powerful weapon against this, equipping young people with knowledge, skills and critical thinking, to challenge and debate in an informed way. Therefore, at National Star we will provide a broad and balanced curriculum, delivered by skilled professionals, so that our service users are enriched, understand and become tolerant of differences and diversity and also to ensure that they thrive, feel valued and are not marginalized.

Furthermore, we are aware that our service users can be exposed to extremist influences or prejudiced views from an early age which emanate from a variety of sources and media, including via the internet, and at times service users may themselves reflect or

display views that may be discriminatory, prejudiced or extremist, including using derogatory language.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by service users or employees will always be challenged and, where appropriate, dealt with in line with the National Star Behaviour Policy for service users and the National Star Conduct Policy for employees.

As part of wider safeguarding responsibilities National Star employees will be alert to:

- Disclosures by service users of their exposure to extremist actions, views or materials of others outside of the organisation, such as in their homes or community groups, especially where service users have not actively sought these out.
- Service users accessing extremist material online, including through social networking sites.
- Family / care giver reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner organisations, local authority services, police reports of issues affecting service users in other settings.
- Service users voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with National Star equality policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others, such as Anti-Western or Anti-British views.

Our organisation will closely follow any locally agreed procedure as set out by the Local Authority for safeguarding individuals vulnerable to extremism and radicalisation.

12.3 **Teaching Approaches**

We will all strive to eradicate the myths and assumptions that can lead to some service users becoming alienated and disempowered, especially where the narrow approaches service users may experience elsewhere may make it harder for them to challenge or question these radical influences.

We will ensure that all of our teaching approaches help our service users build resilience to extremism and give service users a positive sense of identity through the development of critical thinking skills. We will ensure that all our employees are equipped to recognise extremism and are skilled and confident enough to challenge it.

We will be flexible enough to adapt our teaching approaches, as appropriate, to address specific issues in order to become even more relevant to the current issues of extremism and radicalisation. In doing so we will apply the following methodologies:

- Making a connection with service users through good teaching and a person-centred approach.
- Facilitating a 'safe space' for dialogue.

- Equipping our service users with the appropriate skills, knowledge, understanding and awareness for resilience.

Therefore, this approach will be embedded within the ethos of our organisation so that service users know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation. This will work in conjunction with our organisation's approach to the spiritual, moral, social and cultural development of service users.

Our goal is to build mutual respect and understanding and to promote the use of dialogue, not violence, as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes.
- Open discussion and debate

We will also work with local partners, families and communities in our efforts to ensure our college understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our service users' experiences and horizons. We will help support service users who may be susceptible to such influences as part of our wider safeguarding responsibilities and where we believe a student is being directly affected by extremist materials or influences, we will ensure that that student is offered mentoring. Additionally in such instances our college will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

12.4 **Whistleblowing**

Where there are concerns of extremism or radicalisation, service users and employees will be encouraged to make use of our internal systems, to whistleblow or raise any issue in confidence. Please refer to National Star's Whistleblowing Policy for the full procedural framework on our whistleblowing duties.

12.5 **Safeguarding**

Please refer to National Star's Safeguarding policy for the full procedural framework on our Safeguarding and Child Protection duties.

Employees will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue, there may be some instances where a service user may be at direct risk of harm or neglect. For example, this could be due to a service user displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with, or employees may be aware of information about a student's family that may equally place a student at risk of harm. (These examples are for illustration and are not definitive or exhaustive).

Therefore, all adults working within the organisation (including visitors, agency staff and contractors) are required to report instances where they believe a student may be at risk of harm or neglect to the nominated Safeguarding Co-ordinator in the service location, who will liaise with the DSL/P, Safeguarding Practitioner, Deputy DSL/P or on-call Manager as appropriate.

Our Safeguarding reporting arrangements are set out fully in our Safeguarding Policy.

12.6 **Role of National Star Board of Governors**

The National Star Board of Governors will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities, including their statutory safeguarding duties.

The National Star Board of Governors will support the ethos and values of our organisation and will give support in tackling extremism and radicalisation.

In line with the provisions set out in 'Keeping Learners Safe' the National Star Board of governors will challenge the organisation's senior management team on the delivery of this policy and monitor its effectiveness.

12.7 **Review**

The Preventing Extremism & Radicalisation Procedure will be reviewed in September 2026 or in line with changes to legislation.