

NS Policy	SAFEGUARDING POLICY
Senior Manager Responsible	National Director of Services
Superseded Documents	Safeguarding Policy Feb 2016
Policy date	September 2018
Review due date	September 2019
Associated Documents	<p>Safeguarding Procedures, inclusive of Peer on Peer abuse Disciplinary Policy Whistleblowing Policy Anti-Bullying Policy Complaints Policy Health and Safety Policy Acceptable Usage Policy Mental Capacity Act Policy Guidance on Safer working practice Children Missing from Education Procedure Prevent Risk Assessment Deprivation of Liberty Safeguards (2009) Prevent Procedure Safeguarding Children in Education: handling allegations of abuse against teachers and other staff. (2014) Working together to Safeguard Children (2018) Keeping Children Safe in Education (2018) In Safe Hands, Implementing Adult Protection in Wales Wales Interim Policy and Procedures for the Protection of Vulnerable Adults from Abuse 2010 (updated 2013) Safeguarding Children, Working Together under the Children Act (2004) All Wales Child Protection Procedures (2008)</p>

Impact Assessment			
Name	Comments	Date	
L Barrett	Neutral		

Approval	Approval Date
M Saunders	29/10/18

History	Name	Comments
October 2018	CJ	Annual Review & Board approval
December 2017	LB	Annual Review
January 2017	M Saunders	Board approval
February 2017	LB	Included safety & reference to Wales Guidance (page 3)
November 2016	LB	Prevent appendix added
March 2016	FV	
March 2015	GS	

1. Introduction

1.1 Background and legal Framework

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
Acceptable Use Agreement
Guidance on Safer Working Practice
Children Missing from Education Procedure
Prevent Risk Assessment
Prevent Procedure
Safeguarding Children in education: handling allegations of abuse against teachers and other staff (2014)

1.2 Purpose

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 staff who may have concerns of this nature within the context of their work.

This Policy fulfils the requirements of:

Health and Social Care Act (2012)
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 Children (2018)
Care Act (2014)
Safeguarding Vulnerable Groups Act (2006)
Gloucestershire Safeguarding Adults Multi Agency Policy
Equality Act (2010)
Deprivation of Liberty Safeguards (2009)
Keeping Children Safe in Education (2018)
Children and Families Act (2014)
Keeping learners safe (2015)
Safeguarding Children in Education (2014)
Prevent Strategy
In Safe Hands, Implementing Adult Protection in Wales
Wales Interim Policy and Procedures for the Protection of Vulnerable Adults from Abuse 2010 (updated 2013)

2. Scope

This Policy applies to all staff, volunteers and service users. Staff 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. Policy Statement

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

The principles of this policy are as follows:

- The protection of children, young people and adults at risk is everyone's responsibility. Staff should not assume someone else will take action.
- National Star will follow statutory and specialist guidelines in working with children, young people and adults at risk
- 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

National Star recognises its duty to safeguard students, residents and other service users encompasses specific safeguarding issues including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Sexual Harassment and Sexual Violence, Female Genital Mutilation (FGM) forced Marriage, radicalisation, peer on peer abuse and the importance of online safety.

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.

The National Director of Services is the Designated Safeguarding Lead (DSL), this also covers the duties of the Designated Senior Person (DSP). The DSL has overall responsibility for safeguarding within the organisation and will provide advice and support to other staff on welfare and safeguarding matters. National Star has a National Safeguarding Lead who is a Deputy Designated Safeguarding Lead. The Head of Services Wales and West will also act as the Deputy Designated Safeguarding Lead. During core working hours the DSL or a DDSL will be available. Outside of these hours all safeguarding concerns should be reported to the on-call Manager.

Staff members who have concerns about a student, service user or resident should raise these with the National Safeguarding Lead DSL or DDSL who will decide whether to make an alert to the Local Authority Safeguarding Team. However, any staff member can refer their concerns about a child to children's social care 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.

Should a referral to any Local Authority (including social services) 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 National Safeguarding Lead shall ensure the ESFA are notified that a referral has been made.

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 National Safeguarding Lead will ensure the ESFA are notified that a referral has been made.

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

In line with Keeping Children Safe in Education (2018), National Star have a duty to protect students against Peer on Peer abuse. There are many forms of abuse that can occur between peers, such as; physical abuse, sexually harmful behaviour/sexual abuse, sexual harassment and sexual violence, bullying (including banter), cyber bullying, sexting, initiation/hazing and prejudiced behaviour.

All **significant** concerns around peer on peer abuse must be reported to the National Safeguarding Lead using a Significant Event Form.

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

National Star will exercise care in the appointment of all those working with children, young people and adults at risk, working to 'Keeping Children Safe in Education' and '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 the Prevent Procedures
- is registered with their relevant professional body (if appropriate)

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

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

National Star will promote safeguarding through improving the personal knowledge of Service Users of their own safety and by ensuring they are and feel safe.

4. Roles & Responsibilities

4.1 Implementation

National Star 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.

All safeguarding procedures will be implemented by all staff and volunteers.

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

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

The Designated Safeguarding Lead, National Safeguarding Lead and Designated Senior Managers (where appropriate) will be responsible for investigating any safeguarding concerns reported.

For services in Wales, operational safeguarding issues will be the responsibility of the Deputy Designated Safeguarding Lead 'Head of Services Wales and West, and the nominated Safeguarding Co-ordinator at the service location, in liaison with the DSL and the National Safeguarding Lead.

4.2 Support, Advice and Communication

Information and advice regarding this Policy can be obtained from the Designated Safeguarding Lead.

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

This policy will be available on the National Star intranet.

5. Review

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

Appendix 1: Preventing Extremism & Radicalisation Procedure

Introduction

National Star is committed to providing a secure environment for students where they feel safe and are kept safe. All staff 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 students or not.

National Star's Preventing Extremism and Radicalisation Safeguarding Policy also draws upon the guidance contained in the DfE Guidance "Keeping Children Safe in Education, (2018)"; and "Prevent: Resources Guide". The document also takes into account advice from the government document "Prevent duty guidance for England and Wales"

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; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

There is no place for extremist views of any kind in our organisation, whether from internal sources – service, staff, or external sources. Our students see our organisation as a safe place where they can explore controversial issues safely and where our staff 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 students and so should be addressed as a safeguarding concern as set out in the flow chart. We also recognise that if we fail to challenge extremist views we are failing to protect our students.

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 students. Education is a powerful weapon against this; equipping young people with the 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 students are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and not marginalized.

Furthermore, we are aware that our students 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 students or staff will always be challenged and where appropriate dealt with in line with the National Star Behaviour Policy for students and the National Star Conduct Policy for staff.

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

- Disclosures by students of their exposure to the 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;
- Students accessing extremist material online, including through social networking sites;
- Parental / care giver reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner organisations, local authority services, police reports of issues affecting students in other settings;
- Students 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.

Teaching Approaches

We will all strive to eradicate the myths and assumptions that can lead to some students becoming alienated and disempowered, especially where the narrow approaches students 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 students build resilience to extremism and give students a positive sense of identity through the development of critical thinking skills. We will ensure that all of our staff 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, so as to address specific issues so as 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 students through good teaching and a student centred approach;
- Facilitating a 'safe space' for dialogue, and

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

Therefore this approach will be embedded within the ethos of our organisation so that students 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 students.

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 students' experiences and horizons. We will help support students who may be vulnerable 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.

Whistle Blowing

Where there are concerns of extremism or radicalisation service users and staff will be encouraged to make use of our internal systems to Whistleblow or raise any issue in confidence.

Safeguarding

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

Staff will be alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where a students 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 staff 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 National Safeguarding Lead or On-call Manager.

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

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 the DfE guidance 'Keeping Children Safe in Education, 2014' the National Star Board of governors will challenge the organisation's senior management team on the delivery of this policy and monitor its effectiveness.

Written by: Lynette Barrett

Date: 12.12.2016

Reviewed: September 2018

To be reviewed: September 2019