

INSTITUTE OF EDUCATION

SAFEGUARDING PROCEDURES: CHILDREN AND VULNERABLE ADULTS

1 Introduction

- 1.1 The protection of children and vulnerable adults is very important to the Institute. The aim of the Institute's Policy on Safeguarding Children and Vulnerable Adults ("the Policy") and these associated procedures is to ensure the children and vulnerable adults that the Institute comes into contact with are well protected and that there is a system in place to protect their welfare.
- 1.2 The Policy and these procedures seek to minimise the risk of harm to children and vulnerable adults and to ensure that where the Institute's staff, students or visitors have concerns about the welfare of children or vulnerable adults, they are in a position to take appropriate steps to manage those concerns.
- 1.3 The Policy and these procedures are applicable to Institute staff and students as well as to visitors to the Institute. Both of these documents will be available on the Institute's website. Staff applying to work at the Institute will be referred to them in the application materials, and students applying for a place on a course will be referred to them through the prospectus and offer packs. The documents will also be available to visitors to the Institute (where appropriate) when arrangements are made for them to attend the Institute.
- 1.4 References in these procedures and the Policy to "child" or "children" includes all those who are under the age of 18 years.
- 1.5 References in these procedures and the Policy to "vulnerable adults" are references to those aged 18 or over whose physical or mental impairment or condition places them at risk of exploitation or abuse.
- 1.6 Definitions of the four categories of abuse can be found in **Appendix S/0809/28a**.
- 1.7 These procedures have been established in accordance with the Policy and work in conjunction with the Institute's regulations, policies and procedures, in particular the Institute's policy statements on the Recruitment of Ex-offenders and the Secure Storage, Use, Retention and Disposal of Disclosures and Disclosure Information and the Institute's advice document "Criminal Records Checks: Advice to Applicants".

2 Nominated Senior Officer & Designated Safeguarding Officers

- 2.1 As provided for in the Policy, the Director of Administration is the Nominated Senior Officer (NSO) with responsibility for safeguarding children and vulnerable adults.
- 2.2 The NSO will appoint Designated Safeguarding Officers (DSOs) for each Faculty and, where appropriate, relevant Support Departments and the

Directorate. These officers will assist the NSO in discharging his or her duties, for example, by acting as the first port of call for the reporting of allegations, by ensuring that Institute staff, students and, where appropriate, visitors to the Institute, are aware of the policies and procedures in place for safeguarding children and vulnerable adults and that these policies and procedures are followed.

- 2.3 The NSO and the DSOs will be provided with training on a regular basis to ensure that they are able to discharge their duties in accordance with the Policy and these procedures.
- 2.4 An indicative list of duties for the Nominated Senior and Designated Officers is provided at **Appendix S/0809/28b**.

3 Code of Behaviour and Good Practice

- 3.1 The Institute believes that:
 - 3.1.1 all children, vulnerable adults, Institute staff, students and visitors should be treated with respect;
 - 3.1.2 all activities involving children and vulnerable adults should have more than one adult present or, where this is not possible, ensure that the activities take place within sight or hearing of other adults;
 - 3.1.3 respect should be given to a child's or vulnerable adult's rights to personal privacy;
 - 3.1.4 in all activities, Institute staff and students, and visitors to the Institute where appropriate, should be aware that physical contact with a child or young person may be misinterpreted;
 - 3.1.5 in all activities, Institute staff and students, and visitors to the Institute where appropriate, should recognise that special caution is required when discussing sensitive issues with children or vulnerable adults;
 - 3.1.6 where any physical touching is required, it should be provided openly and if this is in a sporting situation, it should be in accordance with the guidelines provided by the appropriate National Governing Body;
 - 3.1.7 in activities, feedback should be constructive rather than negative;
 - 3.1.8 in all activities, Institute staff and students, and visitors to the Institute where appropriate, are required to challenge unacceptable behaviour in accordance with the provisions of these procedures; and
 - 3.1.9 any allegations or suspicions of abuse should be reported immediately to a DSO.

- 3.2 In all dealings with children and vulnerable adults, Institute staff and students, and visitors to the Institute where appropriate, should never:
- 3.2.1 leave children who are in their care unsupervised on Institute premises
 - 3.2.2 play rough physical games or sexually provocative games;
 - 3.2.3 share a room overnight with a child or vulnerable adult;
 - 3.2.4 enter the private room of a child or vulnerable adult unless it is absolutely necessary and if entering such a room must do so accompanied wherever possible;
 - 3.2.5 allow or engage in any form of inappropriate touching;
 - 3.2.6 form or seek to form relationships of a sexual nature or which may lead to sexual activity (ie “grooming”);
 - 3.2.7 allow children or vulnerable adults to use inappropriate language without challenging it;
 - 3.2.8 make sexually suggestive comments even in jest;
 - 3.2.9 intentionally reduce a child or vulnerable adult to tears as a form of control;
 - 3.2.10 allow allegations made by a child or vulnerable adult to go unrecorded or not acted upon in accordance with these or other relevant Institute procedures; and/or
 - 3.2.11 undertake personal activities (such as washing or dressing) for a child or vulnerable adult which they can do for themselves. If a child has a disability, such tasks should only be performed with the full understanding and consent of the parents/carers. A vulnerable adult may be able to consent for him/her self.
- 3.3 Any incidents which cause concern in respect of a child or vulnerable adult are required to be reported immediately to a DSO. Below are examples of incidents which are to be reported.
- When:
- 3.3.1 a child has been left unsupervised on Institute property
 - 3.3.2 a child or vulnerable adult is hurt accidentally ;
 - 3.3.3 there is a concern that a relationship is developing which may be an abuse of trust;
 - 3.3.4 you are worried that a child or vulnerable adult is becoming attracted to you;
 - 3.3.5 you are worried that a child or vulnerable adult is becoming attracted to a colleague who cares for them;

- 3.3.6 you think a child or vulnerable adult has misunderstood or misinterprets something you have done;
- 3.3.7 you have been required to physically restrain a child or vulnerable adult to prevent them from harming themselves or another or from causing significant damage to property;
- 3.3.8 you receive a report from a child or vulnerable adult alleging abuse regarding a member of an external organisation using Institute facilities;
- 3.3.9 you see any suspicious marks on a child or vulnerable adult; and/or
- 3.3.10 you hear of any allegations made by a child or vulnerable adult of events outside the Institute.

4 Recruitment and vetting

- 4.1 The Institute's requirements in relation to staff and prospective student applications for Criminal Records Bureau (CRB) disclosures are set out in "Criminal Records Checks: Advice for Applicants". The Institute's policy statements on the Recruitment of Ex-offenders and the Secure Storage, Use, Retention and Disposal of Disclosures and Disclosure Information provide further information. This information is provided to applicants as early as possible in the application process through inclusion in the prospectus and offer packs and application materials. It is also available on the Institute's website.

5 Training

- 5.1 As referred to at paragraph 2.3 above, training will be provided to the NSO and the DSOs to ensure that they are aware of safeguarding issues, policies and procedures.
- 5.2 In addition, all Institute staff that work with children and/or vulnerable adults will be required to undertake training in relation to the safeguarding of children and vulnerable adults.
- 5.3 Students at the Institute will be provided with training on the safeguarding of children and vulnerable adults as part of their course of studies. Their attention will be drawn at the start of their studies and regularly throughout their studies to the Policy and these procedures.

6 Activities or events run by the Institute where children or vulnerable adults are to be present

- 6.1 Institute staff or students organising activities at the Institute involving children and/or vulnerable adults must ensure that:
 - 6.1.1 a DSO is informed of the activity taking place well in advance and provided with details of the activity as well as details of those individuals involved in the activity;

- 6.1.2 the individuals with responsibility for the children or vulnerable adults involved in the activity are aware of and understand the Policy and these procedures;
 - 6.1.3 private or unobserved contact with a young person is avoided wherever possible;
 - 6.1.4 if first aid is required, where possible, it is administered in the presence of another adult and the DSO is informed; and
 - 6.1.5 parental consent is obtained for the use of any photographs, film or videos.
- 6.2 The DSO is then responsible for ensuring that those individuals assisting in the activity, be they Institute staff, students or volunteers are suitable to work with children or vulnerable adults and that they have had the necessary checks.

7 External organisations visiting the Institute

- 7.1 External organisations working with children or vulnerable adults and using Institute facilities will be required to sign a declaration stating that their staff, and/or volunteers, where appropriate have had the necessary checks and that the organisation has its own policy and procedure and nominated safeguarding officer.

8 Research

- 8.1 Where any research involves contact with children or vulnerable adults, the Research Governance and Ethics Committee will, with guidance from the appropriate DSO, identify any specific practices to be followed in the research in the interests of safeguarding the welfare of children and/or vulnerable adults.

9 Dealing with allegations made by children or vulnerable adults

- 9.1 These procedures aim to strike a balance between the need to protect children and vulnerable adults from abuse and the need to protect Institute staff and students, and visitors to the Institute where appropriate, from false allegations.
- 9.2 If a child or vulnerable adult says something or acts in a way that abuse is suspected the person receiving the information, whether a member of Institute staff or a student, a member of another organisation with which the Institute is working or a visitor to the Institute where appropriate, is required to:
- 9.2.1 react in a calm and considered way but show concern;
 - 9.2.2 tell the child or vulnerable adult that it is right for them to share this information and that they are not responsible for what has happened;
 - 9.2.3 take what the child or vulnerable adult has said seriously;

- 9.2.4 only ask questions to ascertain whether there is a concern but not interrogate the child or vulnerable adult;
- 9.2.5 listen to the child or vulnerable adult and do not interrupt if they are recounting significant events;
- 9.2.6 offer reassurance that the problem can be dealt with;
- 9.2.7 do not give assurances of confidentiality but explain you will need to pass on this information to those that need to know;
- 9.2.8 make a comprehensive record of what is said and done as soon as possible and before leaving work. Keep all original notes as they may be needed as evidence. The comprehensive record should include the following:
 - (i) a detailed record of the account of the child or vulnerable adult as to what occurred in their own words. You should note this record may be used later in a criminal trial and therefore needs to be as full and accurate as possible;
 - (ii) details of the nature of the allegation or concern;
 - (iii) a description of any injury. Please note that you must not remove the clothing of a child or vulnerable adult to inspect any injuries; and
 - (iv) dates, times or places and any other information that may be useful.
- 9.3 The incident, allegation or concern should be reported immediately to a DSO for appropriate action to be taken. If the concerns relate to a specific DSO, then it should be reported to another DSO or to the NSO for appropriate action.
- 9.4 It is the remit of Social Services and/or the Police or other appropriate authority and not anyone connected with the Institute to investigate allegations or suspicions of abuse.

10 Procedure for dealing with allegations or suspicions of abuse made against Institute staff

- 10.1 The DSO who receives a report of an allegation against a member of Institute staff should immediately inform the Dean of Faculty where the allegation is made against an academic member of staff, or the Deputy Secretary for the relevant area where the allegation is made against a member of professional staff. The DSO should also inform the Head of Human Resources of the allegation.) In the absence of the Dean of Faculty, or if s/he is the subject of the complaint, the Deputy Director should be notified.
- 10.2 The NSO, the Head of Human Resources and the Dean of Faculty (or alterative), should discuss whether it is appropriate to make a referral to Social Services and/or the Police . The outcome of this discussion should be

clearly recorded. As part of this discussion the NSO may wish to consult the contact person in Social Services (or other appropriate authority) to establish whether the allegation warrants further investigation.

- 10.3 The possible outcome of paragraph 10.2 above may include the following:
 - 10.3.1 that there should be an immediate referral to Social Services and/or the Police or other appropriate authority to deal with the matter. (The DSO will be responsible for liaising with Social Services and other relevant agencies.);
 - 10.3.2 the allegation was prompted by inappropriate behaviour by the member of Institute staff which needs to be considered under the Institute's disciplinary procedures for staff; or
 - 10.3.3 that the allegation is without foundation and does not warrant further investigation.
- 10.4 Where allegations of abuse call for referral to child protection agencies as in paragraph 10.3.1 above:
 - 10.4.1 subsequent action taken will be in accordance with the procedures established by the Local Safeguarding Children's Board (LSCB) – a statutory committee –, and/or the Police or other appropriate authority;
 - 10.4.2 the DSO will liaise with the appropriate authorities to obtain information on the progress of the investigation and update the Head of Human Resources and the NSO.
- 10.5 Once a course of action has been identified in accordance with paragraph 10.3 above, the DSO should ensure that the parents/carers of the child or vulnerable adult concerned have been informed of the allegation and of the course of action unless to do so would put the child at risk of harm or would be inappropriate for other reasons (for example, the Police or Social Services have stated that they should not be told).
- 10.6 Once a course of action has been identified in accordance with paragraph 10.3 above, unless reasonably asked not to do so by the police or other appropriate authority, the Dean of Faculty (or Deputy Secretary) should meet with the member of Institute staff accused to inform her/him that an allegation has been made and also explain the course of action that is being pursued. It should be made clear to the member of Institute staff that this meeting is not an investigatory meeting or disciplinary hearing. If the allegation is being pursued and the member of Institute staff is a member of a union or professional association, s/he should be advised to contact that organisation for assistance.
- 10.7 Where the allegation requires action in accordance with paragraphs 10.3.1 and/or 10.3.2 and there is potential threat to the member of Institute staff and/or the reputation of the Institute, consideration shall be given to whether it is appropriate to suspend the member of staff concerned. Where suspension

is considered necessary, this shall be carried out in accordance with the appropriate procedures.

11 Referral to the Institute’s disciplinary procedures for staff

- 11.1 Where the outcome falls within paragraphs 10.3.1 and/or 10.3.2, the Institute will be able to refer the matter for consideration in accordance with the Institute’s disciplinary procedures for staff. However, investigation by Social Services, and/or the Police or other appropriate authorities will take priority. The matter may be referred after the appropriate agencies have completed their investigation. The Institute will keep the investigation of all complaints and the records relating to the matter confidential.
- 11.2 The outcome of any investigation and any related disciplinary proceedings will be communicated in writing to the member of Institute staff in accordance with the Institute’s disciplinary procedures for staff.
- 11.3 As set out at 9.4 it is not for the Institute to investigate allegations of abuse. The Institute may investigate failures to comply with policies or procedures and the conduct of its staff generally.

12 Procedure for dealing with allegations or suspicions of abuse made against Institute students

- 12.1 A DSO who receives a report of an allegation about a student should immediately inform the relevant Dean of Faculty and the Academic Registrar of the allegation. In the absence of the Dean of Faculty, or if s/he is the subject of the complaint, the Deputy Director should be notified.
- 12.2 The steps set out at paragraphs 10.2 to 10.7 above should be followed, substituting “student” for “member of Institute staff”, “Student Disciplinary Procedures” or “Fitness to Practise procedures” for “Institute’s disciplinary procedures for staff”, “Academic Registrar” for the “Head of Human Resources”.

13 Referral to the Institute’s disciplinary procedures for students

- 13.1 Where the outcome falls within paragraphs 10.3.1 or 10.3.2 , the Institute will be able to refer the matter for consideration in accordance with the Institute’s disciplinary procedures for students, fitness to practise or other procedures. However, investigation by Social Services and/or the Police or other appropriate authorities will take priority. The matter may be referred after the appropriate agencies have completed their investigation. The Institute will keep the investigation of all complaints and the records relating to the matter confidential.
- 13.2 The outcome of any investigation and any related disciplinary proceedings will be communicated in writing to the student in accordance with the Institute’s disciplinary procedures for students, fitness to practise or other appropriate procedure.

13.3 As set out in 9.4 it is not for the Institute to investigate allegations of abuse. The Institute may investigate failures to comply with policies and procedures and the conduct of its staff generally.

14 Procedure for dealing with allegations or suspicions of abuse made against visitors to the Institute

14.1 If a child or vulnerable adult alleges abuse by a visitor to the Institute, for example from an external organisation, the guidance set out in paragraph 9 should be followed and a report made to a DSO.

14.2 The DSO will consider in consultation with the NSO whether the external organisation will be permitted to continue using the Institute's premises or facilities and whether it is necessary to consult with a person in Social Services and/or the Police or other appropriate authority as part of the initial consideration to establish whether the allegation warrants further investigation and what further action on the part of the Institute is appropriate.

15 Procedure for dealing with allegations or suspicions of abuse outside the Institute

15.1 If you are concerned about an incident which has occurred outside the Institute premises, for example during the course of a teacher training placement, that concerns an allegation against an individual who is not a member of Institute staff, an Institute student or where appropriate a visitor to the Institute, you are required to raise the matter with a DSO who will consider the appropriate steps to take and ensure that appropriate procedures are followed.

16 Individuals under investigation

16.1 If a member of Institute staff is under investigation by Social Services, the Police or other appropriate authority, for actions that might give cause for concern about their suitability to work with children or vulnerable adults, they must report this to the relevant Dean of Faculty or the relevant Deputy Secretary, and to the Head of Human Resources.

16.2 If a student is under investigation by Social Services, the Police or other appropriate authority for actions that might give cause for concern about their suitability to work with children or vulnerable adults, they must report this to the Dean of Faculty in which they are studying and to the Academic Registrar.

16.3 Where appropriate, if a visitor to the Institute is under investigation by Social Services, the Police or other appropriate authority for actions that might give cause for concern about their suitability to work with children or vulnerable adults, they must report this to the Deputy Secretary, Facilities & Estates.

16.4 If an individual is uncertain whether s/he should report an investigation, s/he should discuss the matter with the NSO.

17 Record keeping, using and storing information

- 17.1 Where an allegation has been made against a member of Institute staff or a student all documents relating to the allegation will be returned to the Head of Human Resources or the Academic Registrar respectively to be kept in the personal file of the member of Institute staff or the student when the case has been concluded. If the allegation was found to be malicious or without foundation, no record will be kept in the personal file except when this is requested by the member of Institute staff or a student.
- 17.2 Where an allegation was made against a visitor to the Institute, records should be kept securely and should an investigation be carried out, copies of these records should be passed to the appropriate authority.
- 17.3 All information in relation to allegations raised about Institute staff or students, or where appropriate visitors to the Institute, should be kept securely and for no longer than is necessary.

18 Monitoring and Evaluation

- 18.1 The NSO will keep a central record of any incidents relating to safeguarding children or vulnerable adults and report them in an anonymised form to Council on a yearly basis. This will be confidential and if any concerns or patterns emerge these will be dealt with appropriately.

19 Review of policy and procedures

- 19.1 The Policy on Safeguarding Children and Vulnerable Adults will be reviewed annually by the NSO in consultation with expertise within the Institute, and externally where it is considered necessary, to ensure that it continues to meet the Institute's best practice and legislative obligations.

Definition of Abuse

1 Abuse

1.1 Abuse can take a number of forms. There are four categories of abuse which are relevant for the purposes of registration on the child protection register and these are:

1.1.1 **Physical** abuse which may involve:

- (i) beating;
- (ii) hitting;
- (iii) pushing;
- (iv) shaking;
- (v) kicking;
- (vi) throwing;
- (vii) pinching;
- (viii) biting;
- (ix) choking;
- (x) hair-pulling;
- (xi) burning with cigarettes, scalding water or other hot objects;
or
- (xii) severe physical punishment.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

1.1.2 **Sexual abuse** which may involve:

- (i) Fondling, touching or kissing a child's genitals or making a child fondle an adult's genitals;
- (ii) violations of bodily privacy, such as forcing the child to undress or spying on a child in the bathroom or bedroom;
- (iii) using a child in the production of pornography, such as a film or magazine or exposing children to pornography;
- (iv) luring a child for sexual liaisons, through the internet or by any other means; or

- (v) sexual exploitation such as using a child to perform sex with others or sexual acts with a child, penetration, intercourse, incest, rape, oral sex.

1.1.3 **Neglect** which may involve:

- (i) failing to provide adequate food or clothing;
- (ii) failing to protect a child from physical and emotional harm or danger;
- (iii) failing to ensure adequate supervision, including using inadequate people to provide care;
- (iv) failing to ensure access to appropriate medical care or treatment; or
- (v) being unresponsive to a child's emotional needs.

1.1.4 **Emotional** abuse which may involve:

- (i) ignoring;
- (ii) withdrawal of attention;
- (iii) rejection;
- (iv) threatening or frightening;
- (v) belittling such as telling the child he or she is “no good”, “worthless”, “bad”, or “a mistake”;
- (vi) using extreme forms of punishment, such as confinement to a closet or dark room; or
- (vii) witnessing the physical abuse of others.

1.2 The above definitions, provided for guidance purposes only, indicate acts (or omissions) which may constitute abuse. They are as relevant in the context of vulnerable adults as they are with children. They should not be considered exhaustive and if any member of Institute staff, student or visitor to the Institute (where appropriate) has any concerns about a child or vulnerable adult they should raise these concerns with the appropriate individual in accordance with these procedures.

Indicative Duties of the Nominated Senior Officer

- To be accountable for the Institute's safeguarding practice;
- Ensure safeguarding is afforded priority at most senior level within the Institute;
- Ensure that staff and committee structure is in place to fulfil safeguarding responsibilities;
- Ensure funding and resources are available to fulfil safeguarding responsibilities;
- Ensure procedures in place for managing allegations, including press strategy;
- Develop HEI-wide procedures, practice and guidance for safeguarding, taking into account any Local Safeguarding Children Board Guidance
- Create a network of Principal Designated Safeguarding Officers
- Ensure monitoring and review systems are in place to respond to new guidance and legislation and to test existing systems
- Ensure that the Institute has procedures for dealing with allegations of abuse against members of staff and volunteers
- Ensure all staff are trained appropriately according to their roles

Indicative Duties of the Designated Safeguarding Officer(s)

- Refer allegations or cases of suspected abuse to relevant investigating agencies;
- Act as source of support, advice and expertise within the Faculty/Support Department
- Liaise with the NSO to inform him/her of any issues and ongoing investigations
- Ensure that there is always cover for this role
- Undertake appropriate training
- Organize training for other staff within the Faculty/Support Department
- Keep detailed and accurate records of any referrals, concerns or incidents

Institute of Education Safeguarding Policy: Children and Vulnerable Adults

Policy Statement (to be read in conjunction with accompanying procedures)

1. Introduction

The Institute of Education is a mainly postgraduate institution, with students, researchers and staff working within the fields of Education and related social sciences. Given its pre-eminent position in these areas, its role in training teachers for London and its commitment to social justice, the Institute sees itself as being particularly well-placed to take a leading role in safeguarding children and vulnerable adults.

The Institute is a registered body using the Criminal Records Bureau (CRB) disclosure service for staff and students, and has a policy statement on the Recruitment of Ex-offenders, and policies on the safe handling and storage of applications for enhanced disclosure. Both of these policies are available on the Institute's website. From October 2009, the Institute will be a registered body with the Independent Safeguarding Authority (ISA).

Enhanced Disclosures are always requested of staff and students where such a request is both proportionate and relevant to the position concerned.

2. Nominated Senior Officer and Designated Safeguarding Officers with responsibility for safeguarding children and vulnerable adults

The institute has designated the Director of Administration as the Nominated Senior Officer (NSO) with responsibility for safeguarding children and vulnerable adults. The Institute will also put in place Designated Safeguarding Officers (DSOs) for Faculties and relevant Support Departments. As Nominated Senior Officer, the Director of Administration will, in conjunction with the DSOs and other senior staff :

- keep under review any Institute activities which involve children and vulnerable adults on-site
- put appropriate policies and procedures in place to safeguard children and vulnerable adults
- provide clear guidance on appropriate supervision of young people by accompanying adults

- ensure the use of reputable employment agencies who guarantee appropriate licensing of security and events staff who are likely to have regular unsupervised contact with children/young people or vulnerable adults

3. Requirement for Enhanced Disclosure for staff in “regulated positions”

The Institute will maintain robust systems to obtain Enhanced Disclosures for all staff working within a “regulated position”, as defined by the Criminal Justice and Court Services Act 2000, (CJ and CSA 2000), Section 36, Subsections 1 and 2.

4. Appropriate note of principles set out in guidance to schools and FE and following same principles where appropriate

The Institute will continue to pay proper heed to principles set out in guidance to schools and FE, and will follow such principles where this is appropriate. In addition, the Institute will continue to take an active role in consulting on such guidance when given the opportunity to do so.