

Child Protection Policy

General Policy Statement

INTO University of Gloucestershire is committed to and has both a statutory and moral duty to ensure that the Centre functions with a view to safeguarding and promoting the welfare of children receiving education at the Centre.

Definitions

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

Adults: while there is no formal definition, within the context of INTO University of Gloucestershire an at risk adult could include a person displaying any of the following:

- With a disability (e.g. physical, mental, learning)
- Travelling away from home for the first time
- In an alien culture
- With a low level of language

Safeguarding: in this context is used as the generic term to describe approaches to ensuring the well-being of children or at risk adults.

Child Protection: describes the detailed approach to protect individuals/groups under 18 years of age from direct harmful behavior.

Scope

INTO University of Gloucestershire recognises that whilst there is no statutory requirement to safeguard adults who are not vulnerable it is best practice for preventative considerations and measures to extend to these individuals. This reflects the emphasis at INTO University of Gloucestershire of supporting the well-being of the whole student and staff community.

Context

This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and staff. Such policies can be found in the Student and IUP Staff Handbooks.

In addition, this document is complementary to the INTO University of Gloucestershire Safeguarding Policy.

To reflect emerging good practice and legislative changes into the future, additional information, advice and guidance will be sought from the Gloucestershire Safeguarding Children Board that is relevant to operations within the Centre.

The Joint Venture Board / Management Committee will have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and staff in the Centre.

The policy applies to all staff, managers, homestay providers, volunteers and consultants working for INTO University Partnerships.

INTO University of Gloucestershire will provide this policy document:

- To new staff during induction.
- To homestay providers on every occasion a student under the age of 18 is placed with them.
- To prospective students and parents/guardians prior to application
<https://www.intostudy.com/en-gb/terms/university-of-gloucestershire>
- To contractors and volunteers prior to their start date.

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

- To promote good practice and raise awareness of child protection issues amongst all INTO staff, managers, volunteers and consultants in order to provide a safe environment in which all children can learn and develop;
- To promote awareness of the designated senior members of staff with Child Protection responsibility within the Centre, and at Senior Executive/Director level across the Company;
- To provide INTO staff with relevant training in order to make informed and confident responses to specific child protection issues;
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse;
- To ensure that INTO practices safe recruitment in checking the suitability of staff to work with children.

1. Promoting Good Practice – Guidelines

- 1.1. All employees are encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations including awareness of the 'Use of Reasonable Force'.
- 1.2. All children regardless of age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the right to protection from abuse and/or violence.
- 1.3. All employees should treat all students equally with respect and dignity.
- 1.4. It is important to understand that strong emotions can be aroused by certain child abuse situations, however it is vital that these feelings do not interfere with one's judgement about the appropriate action to take.
- 1.5. All employees should work to establish and maintain an environment where children feel secure, are encouraged to talk, and listened to.
- 1.6. All employees are required to make written records of concerns about children, even where there is no need to refer the matter immediately, and pass these to the nominated person.

- 1.7. All employees have a crucial role to play in identifying welfare concerns and indicators of abuse and neglect at an early stage.
- 1.8. All visitors must be signed in and out of the Centre and must be escorted when on the premises.
- 1.9. All employees have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect, at an early stage.
- 1.10. All staff should be aware of their duty to raise concerns about the actions or attitudes of their colleagues under the whistle blowing policy (see IUP Staff Handbook). We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 1.11. All staff should be aware of their duty to raise concerns about peer on peer sexual or physical abuse/violence that is witnessed by them or reported to them.
- 1.12. The policy and practice of our Child Protection policy is made with reference to the Government Guidelines “Working Together to Safeguard Children” 2018. These guidelines will be adhered to as Best Practice in respect of procedures and responding to any issue. Designated Safeguarding staff will be required to be familiar with the content of Keeping Children Safe in Education, 2018.

2. The Designated Staff with Responsibility for Child Protection

- 2.1. The designated senior member of staff with lead responsibility for child protection issues at INTO University of Gloucestershire is the Centre Director. The Centre Director will receive appropriate training and support for this role, and all INTO staff will be made aware of this contact.
- 2.2. The Student Welfare and Exams Manager will take lead responsibility for raising awareness amongst employees within the Centre of issues relating to the welfare of children and young people, the promotion of a safe environment within the Centre and how to report concerns.
- 2.3. The Student Welfare and Exams Manager will also be responsible for ensuring the employees in the Centre know how to respond appropriately to situations/issues as they may arise in the Centre and will ensure that their employees are also working in a “safe environment”.
- 2.4. The Designated Safeguarding Lead person is responsible for:
 - 2.4.1. Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies (whether that be a Section 17 ‘child in need’ or a Section 47 ‘significant harm’ referral).
 - 2.4.2. Providing advice and support to other staff on issues relating to child protection.
 - 2.4.3. Maintaining secure storage of all referrals, complaints or concerns, separately from the student file.

- 2.4.4. Ensuring that parents of children and young people are aware of the Centre's Child Protection Policy and Safeguarding Policy.
- 2.4.5. Liaising with appropriate agencies, including Children's Services, local police, LADO (Local Authority Designated Officer) and health professionals, where necessary, attending Child Protection conferences.
- 2.4.6. Ensuring that all staff are provided with appropriate training and are aware of the policy and procedures and conduct themselves appropriately including the Joint Venture Board / Management Committee.
- 2.4.7. Ensuring that all suspicion and allegations of abuse are taken seriously and responded to swiftly and appropriately.
- 2.4.8. Ensuring that appropriate child protection risk assessments are undertaken and any issues are addressed.
- 2.4.9. Ensuring that each staff member has access to and understands the establishment's Child Protection and Safeguarding Policies (especially new or part-time staff who may work with different educational establishments).
- 2.4.10. Ensuring that the Centre undertakes an annual review of all Child Protection issues which have arisen during the previous year (in September), prior to the annual updating of the Child Protection policy.
- 2.4.11. Ensuring that the Centre's Child Protection policy is updated and reviewed annually (working with the Joint Venture Board / Management Committee regarding this task).
- 2.5. The Centre Director is responsible for appointing at least two other employees with responsibility for Child Protection issues within the Centre. These would normally be the Head of Student Experience and the Student Welfare and Exams Manager. These designated staff members:
 - 2.5.1. Report to the senior member of staff with lead responsibility.
 - 2.5.2. Will know how to make an appropriate referral.
 - 2.5.3. Will be available to provide advice and support to other staff on issues relating to child protection.
 - 2.5.4. Have particular responsibility to be available to listen to children and young people studying at the Centre.
 - 2.5.5. Will deal with individual cases, including attending case conferences and review meetings as appropriate.
 - 2.5.6. Will receive appropriate training and support for this role.
 - 2.5.7. Ensure appropriate risk assessments are undertaken and any issues are addressed.

- 2.6. INTO has also nominated the Chief Operating Officer Europe to take overall responsibility for promoting Child Protection and ensuring that the policy and processes are executed and reviewed appropriately.

3. Relevant Training for INTO Staff

- 3.1. INTO University of Gloucestershire will ensure that all staff understand the responsibility placed on the company and individuals in relation to child protection and responsibilities and are provided with sufficient training and support in the area.
- 3.2. This training will help employees to analyse their own practice against established good practice, recognise their responsibilities and report any concerns about suspected poor practice or possible abuse, respond to concerns from a child, and to work safely with children.
- 3.3. All staff will have to complete Safeguarding Training and will be given advice and guidance on safeguarding and on the boundaries of appropriate behaviour and conduct. These matters will form a significant part of staff induction.

4. Defining Abuse and Procedures for Identifying and Reporting Cases or Suspected Cases.

- 4.1. **INTO recognises the following as definitions of abuse:** (please note that this list is not exhaustive and any suspected cases reported will, where necessary, only have information gathered by the designated senior member of staff prior to reporting to the relevant external agencies).
 - 4.1.1. **Physical Abuse** - Physical abuse causes harm to a child's person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - 4.1.2. **Neglect** – Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, failing to ensure adequate supervision or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.
 - 4.1.3. **Sexual Abuse** – Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non penetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

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

4.2. **If a child or young person tells a member of staff about possible abuse:**

- 4.2.1. Treat the matter seriously and keep an open mind.
- 4.2.2. Listen carefully and stay calm.
- 4.2.3. Do not interview the child, although it may be necessary to seek clarity using open questions. DO NOT put words into the child's mouth.
- 4.2.4. Reassure the child that by telling you they have done the right thing.
- 4.2.5. Inform the child you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- 4.2.6. Note the main points carefully and make detailed notes of the date, time, place, persons present, what the child said and did, what you asked etc. Ensure you sign and date this initial record.
- 4.2.7. Immediately report to the designated person. DO NOT try to investigate concerns yourself and DO NOT tell others about the matter.

4.3. **Reporting and dealing with allegations of abuse against members of staff:**

- 4.3.1. Once the designated person has received the accusation they must follow the following guidelines and as outlined in Working Together to Safeguard Children 2018.
 - 4.3.1.1. Assess whether the allegation is serious enough to refer on to local agency/social services.
 - 4.3.1.2. DO NOT investigate the matter with the member of staff, child concerned or potential witnesses.
 - 4.3.1.3. Obtain written details of the concern/allegation, signed and dated by the person who received the allegation (not the child/adult making the allegation).
 - 4.3.1.4. Countersign and date the written details.

- 4.3.1.5. Record any information about times, dates and location of incident(s) and names of any potential witnesses.
- 4.3.1.6. Record discussions about the child and/or member of staff, any decisions made, and the reasons for the decision.
- 4.3.1.7. If an allegation requires immediate attention, but is received outside normal office hours, the designated senior manager should consult the Children's Services emergency duty team or local police and / or inform the LADO (Local Authority Designated Officer) as soon as possible.
- 4.3.1.8. Refer the case to the LADO within 1 working day. Referral must not be delayed in order to gather information and a failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.
- 4.3.1.9. As soon as possible after an allegation is made or a concern of suitability is raised, the designated person should inform the parent(s) or carer(s) of the child/ren involved. The LADO should be consulted first to ensure that this does not impede the disciplinary or investigative processes. In some circumstances, however, the parent(s)/carer(s) may need to be told straight away e.g. if a child is injured and requires medical treatment.
- 4.3.1.10. The parent(s)/carer(s) and the child, if sufficiently mature, should be helped to understand the processes involved and kept informed about the progress of the case and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.
- 4.3.1.11. Advice should first be sought from the LADO, police and Children's Services who may want to impose restrictions on the information that can be provided. However, the principle is that INTO should, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body.

4.3.2. The accused member of staff should:

- 4.3.2.1. Be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
- 4.3.2.2. Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process.
- 4.3.2.3. If suspended, be kept up to date about events in the workplace.

In all cases the relevant regulatory bodies for the setting should be informed of the allegation and the outcome.

4.4. Confidentiality

- 4.4.1. Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.
- 4.4.2. Paper records will be kept in the Student Welfare and Exams Manager's or Centre Director's office (which is secured on a different lock from all other offices). Electronic records to be stored in a secure Box folder, with only the Head of Student Experience, Student Welfare and Exams Manager and Centre Director to have access. Records will be maintained indefinitely (this period will be subject to review).

4.5. Support

- 4.5.1. INTO University of Gloucestershire will work together with Children's Services and/or police, where they are involved, and consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies should take place in order to ensure that the child's needs are addressed. INTO University of Gloucestershire will also ensure that our students are not disadvantaged by language limitations and will ensure that an independent interpreter is available as appropriate.
- 4.5.2. As soon as possible after an allegation has been received, the accused member of staff should be advised. Human Resources should be consulted at the earliest opportunity in order that appropriate support can be provided for the employee via the organisation's welfare assistance programme or employee welfare arrangements.

4.6. Suspension

- 4.6.1. Suspension is a neutral act and it should not be automatic. It should be considered in any case where:
 - 4.6.1.1. There is cause to suspect a child is at risk of significant harm, or
 - 4.6.1.2. The allegation warrants investigation by the police, or
 - 4.6.1.3. The allegation is so serious that it might be grounds for dismissal
- 4.6.2. The possible risks to children should be evaluated and managed in respect of the child/ren involved and any other children in the accused member of staff's home, work or community life.
- 4.6.3. If a strategy discussion is to be held or if Children's Services and/or police are to make enquiries, the LADO should canvass their views on suspension and inform INTO. Only INTO, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or police.

- 4.6.4. If a suspended person is to return to work, INTO should consider what help and support might be appropriate e.g. a phased return to work and/or provision of a mentor, and also how best to manage the member of staff's contact with the child concerned, if still in the workplace.

4.7. Resignations and 'compromise agreements'

- 4.7.1. If an employee tenders his or her resignation, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with these procedures. INTO will make every effort to reach a conclusion in all cases of allegations bearing on the safety or welfare of children even where the employee concerned refuses to co-operate with the process. Wherever possible, the person will be given a full opportunity to answer the allegation and make representations about it. Where an employee resigns it may be difficult to reach a conclusion and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete. However the Company will always endeavor to record and reach a conclusion wherever possible.
- 4.7.2. Settlement agreements – by which a person agrees to resign and the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference – will never be used in such cases.

The above circumstances will not prevent a thorough police investigation where appropriate, nor can it override our statutory duty to make a referral to Disclosure and Barring Services where circumstances require that.

5. Safe Recruitment of Staff

- 5.1. INTO will ensure that as part of its recruitment policy all staff working in the Centre:
 - 5.1.1. Will have appropriate DBS checks PRIOR to the start date as far as is practically possible. If the result is not received before commencement of employment, the member of staff will need to have a Children's Barred List check carried out to confirm their suitability to begin work.
 - 5.1.2. Will have been interviewed, clarification on gaps in CVs sought to the interview panels satisfaction, and reference checked as far as practically possible to a satisfactory level PRIOR to start date.
 - 5.1.3. Will have had their identity checked PRIOR to start date.
 - 5.1.4. Will have seen documentary evidence of their qualifications PRIOR to start date.
 - 5.1.5. All offers of employment are conditional upon meeting the above requirements.

6. Contact Details

6.1. INTO University of Gloucestershire

6.1.1. INTO UOG Designated Safeguarding Lead – Rhona McDonald 01242 714891

6.1.2. INTO UOG Designated Safeguarding Deputies

Mark Sharrock 01242 714915

Sandra Myers 01242 715072

6.2. Gloucestershire Local Authority Designated Officer - LADO

Nigel Hatton

Nigel.hatton@gloucestershire.gov.uk

01452 426994

6.3. Police

6.3.1. Police Central Referral and Tasking team – 101

6.3.2. Out of Hours Operational Control team – 01452 726920

6.3.3. In an emergency 999.

6.4. Training

Please contact Rhona McDonald for information on training – 01242 714891

6.5. Social Care

Children and Families Helpdesk – 01452 426565

childrenshelpdesk@gloucestershire.gov.uk

Social Care Customer Service Centre for concerns over child protection issues – 01452 726920 (24 hours)