


# **Medway Adult Education Safeguarding and Prevent Policy and Guidance**

 <p><b>Medway</b> COUNCIL <i>Serving You</i></p>	<p><b>Medway Adult Education Safeguarding and Prevent Policy and Guidance</b></p>	<p>DOC ID: SQA152 Author: J Burden Approved by: SMT Issue date: 17/11/22</p>
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## **Introduction**

Medway Adult Education (MAE) has a specific responsibility to safeguard all learners and adults entrusted to its care. The learner's welfare is paramount, and Medway Adult Education puts the learner at the heart of everything that we do.

This policy ensures that safeguarding concerns and referrals will be handled sensitively, professionally and in ways that support the needs of the learner. Its aim is to make explicit the service's commitment to the development of good practice and sound internal service procedures.

The policy provides a clear direction to staff and learners about expected codes of behaviour in dealing with safeguarding adult issues.

## **Purpose of the Policy**

This policy aims to provide all staff within MAE a clear framework to ensure that all policies, procedures and practice relating to safeguarding are consistent.

These guidelines and procedures are designed to:

Prevent the abuse and mistreatment of adults and children.


Promote increased awareness and recognition of the issues surrounding the abuse and mistreatment of adults and children.

The policy will also work in conjunction with the following policies:

- **Keeping Children Safe in Education 2022 (KCSIE)**
- **Working Together to Safeguard Children 2018**
- **Safeguarding Vulnerable Groups Act 2006 (SVGA)**
- **Ofsted Education Inspection Framework 2021**
- **Safeguarding Partners (new 2019)**
- **The Kent & Medway Multi-agency Safeguarding Adults Policy, Protocols and Guidance of April 2016**
- **The Care Act 2014**
- **Medway Council Whistle-Blowing Policy**
- **Medway Council Disciplinary & Grievance Policies**
- **Universal Declaration of Human Rights Act**
- **The Counter Terrorism and Security Act 2015**

It is MAE's intention to review this document annually or in line with new government legislation.

MAE takes the disclosure of abuse, in any form, seriously and never dismisses allegations of abuse. An allegation of abuse or neglect may lead to a criminal investigation. Decisions by staff as to whether or not to report concerns of abuse/mistreatment are not a matter of individual conscience but are considered a professional duty.

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All suspected or alleged abuse should be reported immediately to a lead safeguarding officer:

**Fiona Congreave – 01634 338411      [fiona.congreave@medway.gov.uk](mailto:fiona.congreave@medway.gov.uk)**

**Lorraine Miles – 01634 338448      [lorraine.miles@medway.gov.uk](mailto:lorraine.miles@medway.gov.uk)**

**Carolyn Pilcher – 01634 338436      [carolyn.pilcher@medway.gov.uk](mailto:carolyn.pilcher@medway.gov.uk)**

**Geraldine Burden – 01634 338435      [geraldine.burden@medway.gov.uk](mailto:geraldine.burden@medway.gov.uk)**

The designated safeguarding leads have overall responsibility for safeguarding within Medway Adult Education.

All staff must be aware of the possible signs and symptoms of abuse. Steps must be taken to ensure the immediate safety of those involved. Some adults at risk may reveal abuse by talking, drawing attention to physical signs or displaying certain gestures/actions. This may be their only means of communication. Concerns may be reported by third parties and should be acted upon. Any member of staff who has a concern regarding an adult at risk, however insignificant this might appear to be, has a duty of care to take action by immediate referral to the leading safeguarding officer.

### **The Guiding Principles and Values of This Policy**

It is every learner's right to live free from abuse in accordance with the principals of respect, dignity, autonomy, privacy and equality.

The policy is applicable to all client groups whether living in a domestic setting, care home, social services or health setting or any community setting.


The policy and guidance is based upon commitment to equal opportunities and practice in respect of race, culture, religion, disability, gender, age or sexual orientation.

### **Who is a learner?**

The term 'learner', for the purpose of this policy, covers MAE learners who study at Rochester, Gillingham, online or at any outreach and community centres. The policy also covers those learners who are on a work placement as part of their course, Apprenticeships and Work Based Learning learners. It also covers learners on taster programmes.

### **Who is an Adult at Risk?**

An Adult (a person aged 18 or over) who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself or to take steps to protect him or herself from significant harm or exploitation.

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In accordance with Section 42 of The Care Act 2014 it is important to obtain the views and wishes of the Adult when deciding how, if and what action should be taken.

The Policy recognises that interpersonal relationships are complex and that an adult may exhibit ambivalence and be unclear and unrealistic about their personal circumstances.

### **Who is a Child at Risk?**

In accordance with The Children Act 1989, and therefore in accordance with the law, Medway Adult Education regards any young person below the age of 19 as a child.

### **What is Abuse?**

Abuse is a violation of an individual's human and civil rights by any other person or persons. It may occur as a result of a failure to undertake action or appropriate tasks. It may be an act of neglect or an omission to act, or it may occur where an adult at risk is persuaded to either enter into a financial or sexual transaction to which they have not, or cannot, consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the individual.

Elder abuse is often defined as a single or repeated acts or lack of appropriate action occurring within any relationship where there is an expectation of trust which causes harm or distress to an elder (Action on Elder Abuse definition. Abuse may be a single act or repeated over a period of time).

If a member of staff finds him or herself the subject of inappropriate affection or attention from a learner, member of staff or adult at risk, they should discuss this with their line manager and the designated safeguarding officer immediately.

The lead safeguarding officer will identify the appropriate next steps and keep in contact with the adult at risk to ensure that duty of care is fulfilled.

Significant harm and serious exploitation is defined as any ill treatment that leads to the impairment of or avoidable deterioration in the individual's physical or mental health; intellectual, emotional, social or behavioural development.

It may occur in any relationship and may result in significant harm to, or serious exploitation of, the person concerned.

### **Safeguarding offices will support:**

- Parents or carers with young children at risk of harm
- Any group or individuals presenting violent or extreme ideologies
- Individuals in abusive or inappropriate relationships
- Any forms of abuse or neglect. This would include physical abuse, emotional abuse, sexual abuse or exploitation and neglect and coercive control
- Any form grooming (in person, online, by phone, etc)

- Any form of harassment
- Any form of bullying to include cyber-bullying
- Individuals who are self-harming or at-risk to self or others (mental health)
- Individuals who have disclosed being a victim of up skirting
- Individuals who may have committed a crime
- Any forms of exploitation including sexual, financial, and criminal exploitation
- Individuals who may be experiencing homelessness or are seeking refuge
- Any form of victimisation and prejudice due to race, gender, sexuality, faith and belief or disability
- Any form of substance / alcohol or drug misuse
- Concerns linked to eating disorders
- Honour-based violence which will also include female genital mutilation (FGM) and Forced marriage
- Sexual violence and sexual harassment between any person under 18
- Learners and the court system or with family members in prison
- Criminal exploitation such as county lines
- Learners under 18 at-risk of homelessness
- Learners at-risk through section 2 or 3 of the Mental Health Act
- Will put in place any additional safeguarding systems to support the vulnerabilities of any learner with SEND disabilities
- The prevention of radicalisation (PREVENT)

### **Legal Framework**


The Care Act 2014 placed a duty of care on local authorities, and organisations to investigate situations where an adult or child is at risk of significant harm. Organisations have a legal obligation to work with investigating agencies acting on behalf of adults at risk.

The responsibility for making sure appropriate arrangements are in place lies with Medway Council. Staff members are responsible for carrying out their duties in compliance with the arrangements set out by the Council. Medway Adult Education is not an investigative agency. Investigations are led by local authority Social Services or other agencies with statutory powers.

### **Medway Adult Education Safeguarding Policy**

**These guidelines and procedures are designed to:**

- Prevent the abuse and mistreatment of apprentices, adults, children, elderly learners and learners with specific learning disabilities.
- Promote increased awareness and recognition of the issues surrounding the abuse and mistreatment of adults and children.
- Ensure that all staff working within Medway Adult Education understand their responsibility to protect adults at risk from harm whenever they are in a position to do so.

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- Enable staff to be aware of the possible signs and symptoms of abuse such as unexplained bruising or injuries, a history of unexplained falls or minor injuries, unexplained changes in demeanour and behaviour, social withdrawal and isolation, uncharacteristic aggression or manipulation, poor physical condition, fearfulness and anxiety, loss of esteem.
- Ensure that when abuse/mistreatment is suspected, appropriate action is taken to safeguard learners from further harm and exploitation.
- Ensure that allegations about abuse/mistreatment are investigated thoroughly, efficiently and consistently.
- Respect the rights of all people to live their chosen lifestyle with privacy, dignity, independence, choice and fulfilment.

### **Procedures, Practice and Responsibilities**

Where it is believed that a learner is suffering from, or is at risk of, significant harm, we will follow the procedures set out in the **Multi-agency Safeguarding Adult Protection Policy, Protocols and Guidance for Kent and Medway (April 2016)**.

The Designated Persons for safeguarding Adults within Medway Adult Education are:

**Geraldine Burden (Safeguarding Officer, Medway Adult Education)**

**Fiona Congreave (Safeguarding Officer, Medway Adult Education)**

**Lorraine Miles (Safeguarding Officer, Medway Adult Education)**

**Carolyn Pilcher (Safeguarding Officer, Medway Adult Education)**


Their responsibility is to respond to safeguarding situations, concerns and queries as they arise. They will ensure that information is accurately recorded and stored, facilitate inter-agency liaison to seek advice and ensure Medway Adult Education staff have access to the most current and relevant information.

The lead safeguarding officer will support all MAE staff in fulfilling their duties within the Safeguarding agenda. This will specifically include supporting relevant , regular training for staff and ensuring new members of staff are made fully aware of their duties to Safeguarding and that they are aware of the Medway Adult Education Safeguarding Policy and Guidance, available on MAE's virtual learning environment, Moodle.

### **Confidentiality**

A Disclosure is a term used when someone is reporting a suspicion of abuse. For the purpose of this policy, confidentiality does not mean secrecy and it is essential the person making the disclosure be informed as soon as possible that the information given will be passed on to someone who may take a course of action. Disclosure



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may take place many years after the event for a number of reasons. This delay should not cast doubt on its truthfulness.

There may be some anxieties about legal or ethical restrictions on sharing information, particularly with other agencies. Managers in particular should be aware of the law and should comply with codes of conduct or other guidance available to professional bodies. These rarely provide an absolute barrier to disclosure. Everyone should be prepared to exercise judgement and a duty of care. Failure to pass on information, which might have prevented a tragedy, could result in criticism both of individuals and organisations.

If a person does not wish for a course of action to be taken, whilst respecting their wishes there is also a duty to report any concerns. Each set of circumstances should be assessed individually as a referral may still need to be made to ensure that other adults and/or children are protected from harm.

A decision about whether to disclose information may be particularly difficult if it is considered that disclosure may damage a patient/client/learner relationship. Wherever possible, agreement should be sought from the person concerned and an explanation given should it be decided to act against a person's wish. Consideration of the wider issues of protection and safety of other adults and/or children may necessitate the sharing of information on a 'need to know' basis.

### **Race, Ethnicity and Culture**

All staff should be aware of prejudices to avoid perpetuating racial and cultural stereotypes and therefore avoid being diverted from safeguarding the adult.

All staff must be aware of differing models of family life that can vary according to race, culture, religion, class, ability and community. Each offers its own way of meeting a learner's needs, has its own strengths and must be respected in all aspects of safeguarding.

All staff must adopt an anti-discriminatory approach in safeguarding. Adopting an anti-discriminatory perspective in safeguarding does not mean legal issues or procedures should be undermined or ignored.

All staff should always support and promote British values. MAE is tolerant of all learners, staff and others regardless of their beliefs and faiths.

### **Preventing Extremism and Radicalisation**

MAE Senior Managers and Tutors will work to protect learners from radicalisation and extremism by example. Medway Adult Education recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and should be addressed as a safeguarding concern. It also recognises that failure to challenge extremist views would be failing to protect learners and staff. Staff will respond swiftly where learners are vulnerable to these issues.

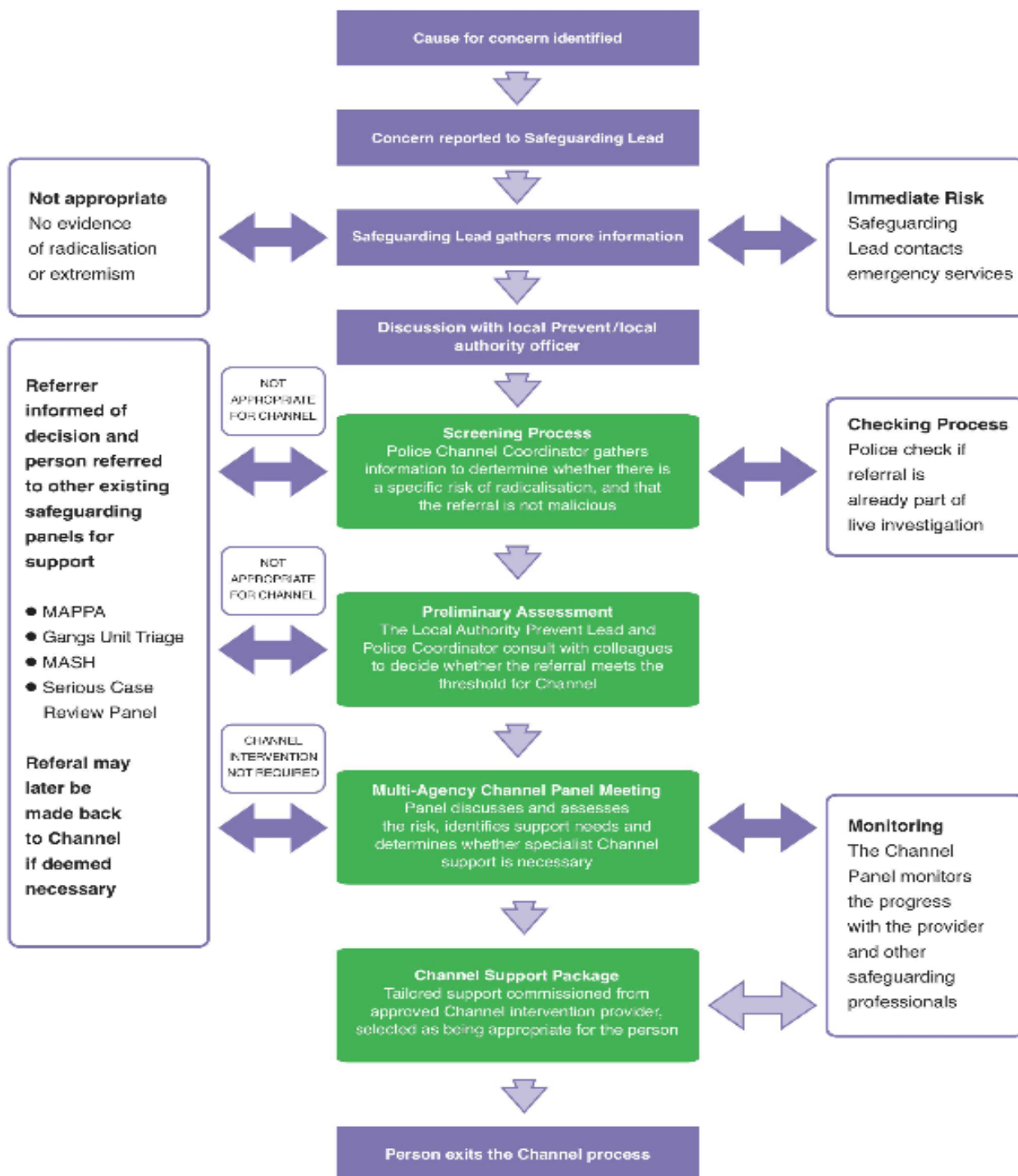
Education is a powerful weapon against extremism, equipping learners with the knowledge, skills and critical thinking to challenge and debate in an informed way. Therefore, MAE aims to provide and support a broad and balanced programme, delivered by skilled professionals, so that our learners are enriched, understand and become tolerant of difference and diversity. This allows the learner to thrive, feel valued and not marginalised. Senior Management and Tutors engage in high quality Prevent Duty Training to develop vigilance, confidence and competency to challenge learners' views and encourage debate.

This strategy aims to stop people from becoming terrorists or supporting terrorism. It contains three key objectives:

- **Ideology:** challenging the ideology that supports terrorism and those who promote it;
- **Individuals:** protecting people from being drawn into terrorism and ensuring that they are given appropriate advice and support; and
- **Institutions:** supporting sectors and institutions where there are risks of radicalisation.

### **What is the Prevent Duty?**

The Prevent Duty is covered under Section 26 of the Counter Terrorism and Security Act 2015 and places a duty on certain bodies, including independent learning providers, to give "due regard to the need to prevent people from being drawn into terrorism."



## What is Extremism?

The government has defined extremism in the Prevent Duty as “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.” Extremism can be violent and non-violent.

For further information on Prevent Duty please refer to:

### **The Counter Terrorism and Security Act 2015**

<http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted/data.htm>

### **Prevent Duty Guidance 2015**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

### **Ofsted Guidelines for Safeguarding within Prevent (September 2015)**

<https://www.safeguardingschools.co.uk/ofsted-inspecting-safeguarding-september-2015>

### **Freedom of Speech**

Freedom of Speech is recognised as a human right under Article 19 of the Universal Declaration of Human Rights. It means learners in an educational environment can enjoy healthy debate while developing respect and knowledge.

### **Physical Contact Code of Practice**

Physical intervention should only be used when a learner is endangering him/herself or others. Such events should be recorded on an incident report form on the Service Desk.

Once a safeguarding concern has been identified it may be necessary to complete a risk assessment. The designated safeguarding officer will provide appropriate support.

A learner, parent or observer may misconstrue physical contact, however well intentioned. As a general principle, staff must not make gratuitous physical contact with their learners.

Physical contact may be a necessary part of teaching some learners, for example those with profound and multiple difficulties. Staff should be aware of the limits within such contact.

There may be occasions where a distressed adult at risk needs comfort and reassurance such as a carer would give. Staff should use their discretion in such cases to ensure that what is normal and natural does not become unnecessary and unjustified contact.

### **Allegations against a Member of Staff**

Medway Adult Education staff should take care not to place themselves in a vulnerable position with relation to safeguarding.

Any concerns that involve allegations against any member of staff should be referred immediately to the appropriate lead safeguarding officer or a senior manager. In any case involving a child, he/she will contact the area Children's Officer to discuss and agree further action. For an adult at risk it may also be appropriate to contact the lead safeguarding officer for Medway Council, Richard Hills, in conjunction with Medway Council's Disciplinary Policy.

All staff should note that failure to report a concern about the conduct of a member of staff that could place a child, young person, elderly person or adult at risk could result in serious disciplinary action. When in doubt, consult a safeguarding officer.


### **Safe Recruitment Practice**

Medway Adult Education follows the safe recruitment procedures as laid down by Medway Council.

### **IT Usage**

Medway Adult Education IT usage is monitored, and websites are restricted by Medway Council IT Department. They will inform Medway Adult Education if there has been any inappropriate use which will be investigated fully by Medway Adult Education.

When learners or apprentices are loaned digital equipment to access learning, they would need to agree to an Acceptable Use Agreement (see appendix 8).

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## Safeguarding Procedures – Guidance for Medway Adult Education Staff

This Guidance has been devised to complement existing guidance to MAE staff.

### What to do if someone reports to you:

- Stay calm
- Listen
- Take it seriously
- Try not to show shock
- Do not judge
- Explain that you will need to share information
- Confirm their version of events
- Ask the person what they want to do
- Reassure them and report to the appropriate person: Medway Adult Education Safeguarding Leads - **Fiona Congreave, Lorraine Miles, Carolyne Pilcher, Geraldine Burden.**

### What to do if you suspect abuse:

- Always talk to the person in a safe and private space
- Listen but be careful not to ask leading questions
- Find out what the person wants to do
- Do not discuss the subject with or challenge the alleged abuser
- Do not repeatedly ask the victim to keep repeating the information given at disclosure as this is the responsibility of the investigating team.
- Do not touch or tamper with any item that could be used in future evidence, particularly forensic evidence, even with the best intentions.
- Remember, it is not your responsibility to handle the situation on your own. You only need to ask the following four questions:
  - What happened?
  - Where did it happen?
  - Who was involved/who was there?
  - When did it happen?

### It is the Responsibility of the Investigating Team to Ask Further Questions

No attempts must be made to question the alleged perpetrator, the alleged victim or any other witnesses other than to establish basic facts and to confirm that abuse may have occurred.

Discuss the situation with your line manager so a referral can be made as soon as possible. Do not commence your own investigation unless guided to do so by the social services agency, police or by a multi-agency planning meeting (in which you may be in attendance).

### **Recording allegations, disclosures and/or suspicion of abuse**

It is important that you **record** any disclosures or suspicions of abuse. You must accurately record your conversation with the person who made the allegation or disclosed possible abuse. If it is you who has witnessed an incident you suspect may constitute abuse, you must accurately record the facts. Use the following checklist when writing your report:

Record what was said or what you have heard, seen or suspected.

Write what the person actually said, not what you think they meant.

Describe (separately if necessary) any previous actions leading to disclosure, allegations or suspicion.

Make sure that you have advised the person making the disclosure or allegation of your duty to report it and of their rights (see 'Confidentiality' elsewhere in this Policy).

If the disclosure was entirely verbal you must take steps to record it, as you remember it, as soon as possible.

Make sure the person feels supported and empowered and, most of all, **safe**.

Tell the person the procedure that you now must follow.

**Remember:** Your report should be accurate and factual. You should not record your or others' opinions. Your report may be used as court evidence or as part of a legal claim and/or disciplinary action. What you record may be used in evidence.

### **What to do if abuse is witnessed or is suspected**

All those involved in the care of learners must provide appropriate care and support to prevent abuse happening. If, however, there are concerns about abuse it is essential to take steps to stop the abuse and prevent it happening again.


Steps must be taken, if necessary, to ensure the immediate safety of the victim(s).

Concerns for a child, young person or adult at risk or elderly persons need to be disclosed and discussed with a Safeguarding Officer immediately. As soon as abuse is suspected or reported this should be discussed with your line manager / safeguarding officer.

If you believe your line manager is implicated in the suspected abuse you may consult the police, social services or relevant regulatory authorities and discuss your concerns with them.

Consider any complaints from service users or their family, as these may be regarded as disclosures of alleged abuse.



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Preserve forensic evidence - do not clean up or destroy evidence.

Any discussions with a safeguarding officer will be recorded.

Every staff member and volunteer in all agencies and services has a professional and moral duty to report any witnessed or suspected abuse to their line manager or to Social Services.

### **Referral**

The flowchart in Appendix 4 is for anyone who works with or has contact with adults. This includes family, formal or informal carers, social work and health professionals, volunteers and managers and staff in private and voluntary agencies, including care workers.

Referrals will be made using the **Report an adult safeguarding concern**, which can be found on the Medway Council website: [www.medway.gov.uk/abuse](http://www.medway.gov.uk/abuse)

Inform the care environment of your decision if appropriate. It is your responsibility to ensure action is taken to ensure the adult's welfare, even if others disagree with you.

### **Remember:**

Should you wish to talk through your concerns at any point, contact the Medway Adult Education Designated Person for Safeguarding. Contact details can be found at the end of the policy.

Throughout the whole process, document your discussions, who you spoke to, including the date and time and clearly record actions agreed.

Store all safeguarding information with Medway Adult Educations' designated Safeguarding Officer.


Records should use clear, straightforward language avoiding departmental abbreviations. They should be concise and factual but also differentiate between opinion, judgement and hypothesis. Any decisions made should be recorded and the reasons for doing so clear.

You have a legal duty to act independently of Medway Adult Education and/or the Duty Social Worker if you feel the learner at risk is in need of services or protection.

In an emergency contact the relevant emergency service directly.

A referral should be made when it is considered that an adult at risk has needs which cannot be met solely by the services or resources available within Medway Adult Education, and where, following an assessment of the situation, it is believed coordinated intervention is required to promote, safeguard or protect the welfare of the learner.



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The basic details that staff have a duty to record are vital to the information gathering process and do not constitute an investigation. It is essential that at the end of this process everyone involved is clear as to whether a referral to social services is made. All referrals will be monitored and followed up by the Designated Safeguarding Officer.

## **Promotion and Engagement**

- The policy is shared with all staff
- The policy is included within staff handbooks
- Within the learner welcome pack learners and apprentices have information on Safeguarding and Prevent and the contact details of the Designated Safeguarding Lead and other contact details of support services if they have concerns.
- The policy is published on the Medway Adult Education website
- Safeguarding, British Values and Prevent is discussed at apprentice and employer review meetings and in training and development
- New staff are briefed on this policy and its implementation, and trained in Safeguarding and Prevent during induction
- Existing staff are re-briefed on this policy and its implementation, and re-trained in Safeguarding and Prevent every two years, with an annual update
- Training is monitored through the Medway Adult Education EBS system and within the Performance and Development Review process
- Staff with teaching and learning responsibilities are trained in embedding Safeguarding and Prevent into their practice and the content of their delivery with learners and apprentices
- Safeguarding information and what to do if you have a Safeguarding concern are provided on noticeboards in each classroom
- All learners, apprentices and staff are provided with the opportunity to develop their skills and confidence and to deal with Safeguarding & Prevent issues in a professional manner
- Staff complete and observe internal training & events in line with organisational policies
- Learners/apprentices complete British Values & Prevent training as part of their curriculum
- Medway Adult Education ensures that staff are aware of the issues of Safeguarding and Prevent and other learners affected by Safeguarding concerns
- Learners/apprentices are briefed on this policy and how to raise a related issue and are trained in British Values and Prevent during induction.

## **Appendix 1. Designated Person Safeguarding Roles and Responsibilities**

The Medway Adult Education Designated Person for Safeguarding will:

- Make themselves available to colleagues wherever practical to discuss any concerns or queries, or to offer support prior to, during and after a Safeguarding Protection issue.
- Act as a conduit of information for Medway Adult Education and will direct their colleagues to those agencies that can offer the most appropriate advice.
- Be responsible for advising on the procedures for Safeguarding that are to be followed. The Designated Person is not responsible either for action taken by a colleague or undertaking action on a colleague's behalf, unless by prior agreement.
- Ensure, along with Medway Adult Education's Service Managers, that they have the relevant level of training and that all information, guidance, and training is current and timely.
- Place Safeguarding as a standing Item on the agenda at all Medway Adult Education management meetings.
- Circulate any relevant information to the Medway Adult Education senior management team and governance board.
- Take advice, if necessary, from outside agencies to enable them to support colleagues competently and confidently.
- Will support colleagues to ensure all information of a safeguarding nature is stored securely and in compliance with Medway Adult Education policy
- Will keep colleagues up to date and share good practice, on Safeguarding issues
- Once a safeguarding concern has been identified it may be necessary to complete and store a risk assessment. The designated safeguarding officer will support the manager/tutor do this.


### **Record Keeping**

Any information of a safeguarding nature needs to be recorded and stored securely in line with guidance. This is to ensure work is accountable and focused. It is also an important part of multi-agency working and continuity when individual workers are unavailable or change.

Records are also an essential part of evidence for any investigations or inquiries. Staff always need to be aware that records may also be disclosed in court proceedings.

A separate Safeguarding file needs to be created in which to store the records of any Safeguarding issues. Any subsequent documentation, such as referral forms, reports or minutes of meetings must also be stored here. Notes following discussions with the Designated Person for Safeguarding or other agencies should also be included.

This file will be stored in a secure cabinet.

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The Safeguarding Alert Form (SAF) (see Appendix 9) should be used for any discussions between the member of staff and the Medway Adult Education Designated Person for Safeguarding. They should record their conversation and agree the content once it has been written to ensure an accurate account of their discussion. Both should also sign the record. In the case of a telephone discussion or location which makes this impossible, the person who completes the record must ensure that the other person involved countersigns it as soon as possible.

Any information that needs to be filed in the Safeguarding file should be placed with the designated Safeguarding Officer. Filing must be completed immediately, and papers must not be left lying around.

As with all other learner related information, information relating to safeguarding vulnerable issues must not be removed from the office without prior agreement of the Medway Adult Education Designated Safeguarding Officer.

If necessary, the MAE Designated Safeguarding Officer will agree a timescale for a follow-up discussion with colleagues following a Safeguarding discussion. That date should be recorded and noted in diaries to act as an aide memoir.

At all times, staff should be aware that anything they write may be seen by parents, carers, learners and other agencies and or used as evidence in court. Therefore, information must be factual. Any expression of opinion must be clearly recorded as such and justifiable.

The Medway Adult Education Designated Person for Safeguarding will support colleagues to ensure all information of a Safeguarding nature is stored securely and in line with Medway Adult Education policy.

## Appendix 2. Designated Safeguarding Persons' Contact Details

The Medway Adult Education Designated Persons for Safeguarding are:

**Fiona Congreave:** ..... 01634 338436  
Programme Manager, Eastgate, Rochester, Kent ME1 1EW

**Carolyn Pilcher:**..... 01634 338411  
Programme Manager, Eastgate, Rochester, Kent ME1 1EW

**Lorraine Miles:** ..... 01634 338448  
Programme Manager, Medway Learning and Skills Hub, Unit 2 Britton Farm Street,  
Kent ME7 1GX

**Geraldine Burden:**..... 01634 338435  
Quality and Curriculum Manager, Medway Adult Education, Rochester Centre,  
Rochester ME1 1EW

### Social Care Services

**Social Care Customer First Team:** 01634 334466 - Fax No. 01634 333188

### Appendix 3. References

The following documents and websites should be read and used in conjunction with this policy. More information can be found:

[www.medway.gov.uk/abuse](http://www.medway.gov.uk/abuse)

[www.msrb.org.uk](http://www.msrb.org.uk)

<http://www.medway.gov.uk/index/socialcare/abuse.htm>

<http://www.elderabuse.org.uk/>

<http://www.anncrafttrust.org/>

<http://www.fco.gov.uk/en/fco-in-action/nationals/forced-marriage-unit/>

[http://www.kent.police.uk/advice/victims/abuse assault/domestic abuse/dom abuse .html](http://www.kent.police.uk/advice/victims/abuse%20assault/domestic%20abuse/dom%20abuse.htm)  
[www.tradingstandards.gov.uk/medway](http://www.tradingstandards.gov.uk/medway)

[www.scie.org.uk/publications/practiceguides/practiceguide07/index.asp](http://www.scie.org.uk/publications/practiceguides/practiceguide07/index.asp)

[www.dh.gov.uk/en/SocialCare/Deliveringadultsocialcare/Vulnerableadults/index.htm](http://www.dh.gov.uk/en/SocialCare/Deliveringadultsocialcare/Vulnerableadults/index.htm)

#### **The Counter Terrorism and Security Act 2015**

<http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted/data.htm>

#### **Prevent Duty Guidance 2018**

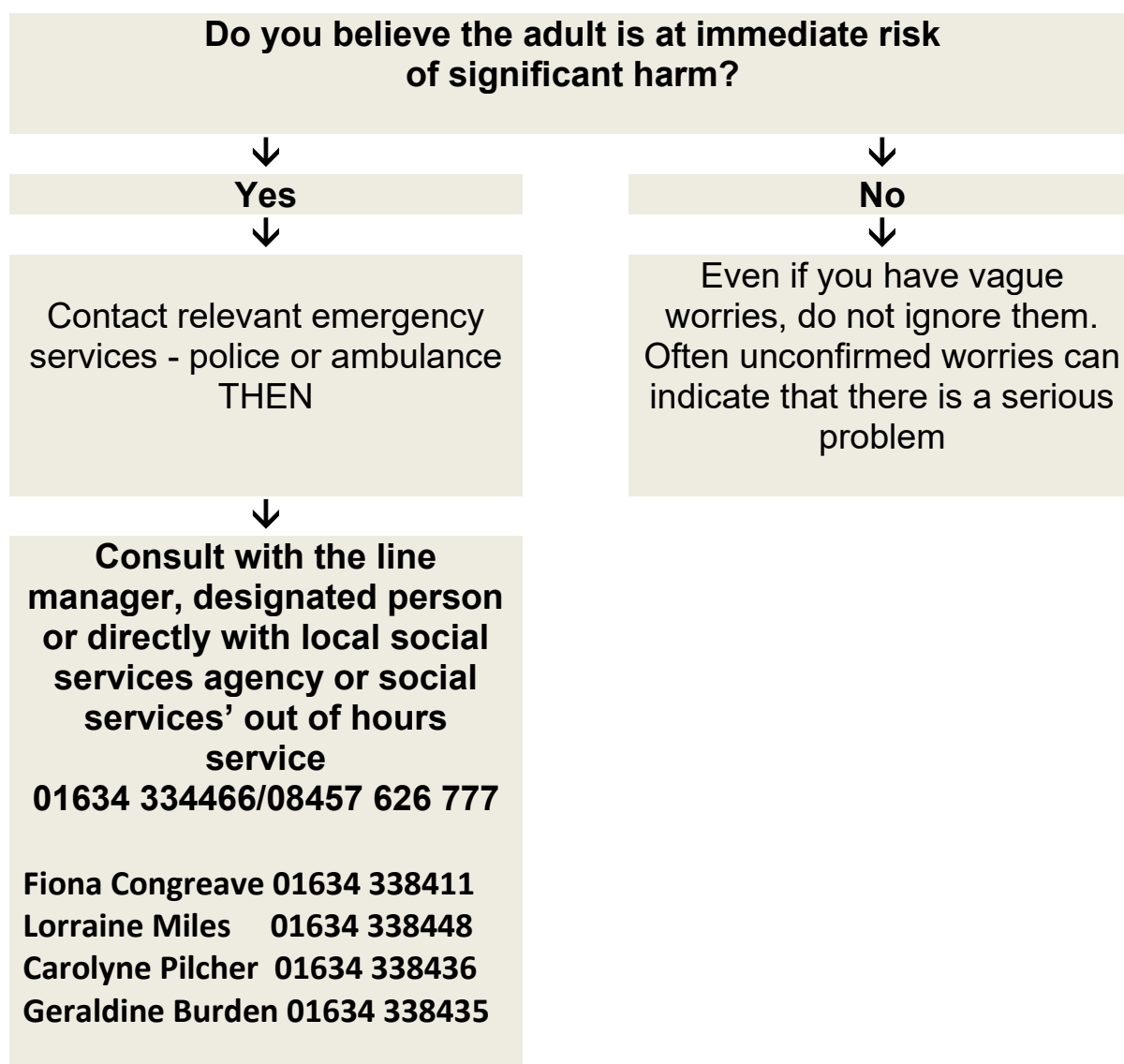
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799 Revised Prevent Duty Guidance England Wales V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

#### **Prevent Duty Guidance for further education institutions**

<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-further-education-institutions-in-england-and-wales>

## Appendix 4. Flowchart for Initial Concerns About Adult Protection

**If You See or Suspect Abuse:**



**Recognise, Record** the facts  
and **Refer**  
Do not investigate.  
Inform your designated  
Safeguarding Officer as soon as  
possible

**Make an adult protection referral yourself online [www.medway.gov.uk/abuse](http://www.medway.gov.uk/abuse)**

## Appendix 5. Safeguarding Procedure

- A learner comes to you with an allegation
- A learner makes a disclosure of abuse to you
- You have a concern about a learner
- You have a concern about a colleague

### Listen

- If someone is disclosing or making allegations:
- If possible secure their immediate safety.
- Allow him/her to speak without interruption
- Do not ask leading questions
- Reassure him/her that you have listened and will act
- Explain that you must pass the information on to those who need to know
- Always accept what has been said and without judgement
- Don't question or investigate yourself
- Never promise confidentiality


### Act

You see or suspect:

- Non-accidental injury
- Sexual abuse
- Neglect

### Report

- Tell your Designated Person or Contact the emergency services if required
- In an emergency or if you think that a crime has been committed contact the relevant emergency services
- Write down your concern or what you have been told
- If arising from a conversation, this report should be verbatim and include relevant contextual information, such as the time and date
- Sign the report and take it directly to the designated persons:
  - Fiona Congreave ..... 01634 338411
  - Lorraine Miles ..... 01634 338448
  - Carolyne Pilcher ..... 01634 338436
  - Geraldine Burden..... 01634 338435

 <p><b>Medway</b> COUNCIL <i>Serving You</i></p>	<p><b>Medway Adult Education Safeguarding and Prevent Policy and Guidance</b></p>	<p>DOC ID: SQA152 Author: J Burden Approved by: SMT Issue date: 17/11/22</p>
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### **Out of Hours**

Record the facts on the Medway Council Website:

<https://www.medway.gov.uk/abuse>

Contact the Emergency services if required and Social Services on 03000 419191 for advice

Inform your Designated Person as soon as you can

If the designated person is the focus of the concern, please contact the Quality and Curriculum Manager, Geraldine Burden.

### **Investigating Concerns**

The responsibility of most staff is **not** to investigate. Only individuals holding certain roles are involved in investigations of abuse. However, if the designated person feels that the concern warrants further action:

The Quality and Curriculum Manager will be notified within one working day.

The Programme Manager will make a referral to relevant organisation.



## **Appendix 6. Preventing Violent Extremism**

Prevent is one strand of the Government's counter terrorism strategy, Contest. Its main aim is to prevent people from becoming terrorists or supporting terrorism and it promotes the safeguarding of vulnerable people.

The Prevent Strategy has three clear objectives:

Terrorist ideas should be identified and challenged

Learners should be supported and protected from becoming terrorists or supporting terrorism

Communities, institutions and the Government should all work together to tackle the problem of extremism

Medway Adult Education holds a responsibility to ensure all staff and learners have knowledge in recognising risk and addressing it appropriately. Strategies to meet this obligation include: staff induction and via CPD sessions for staff.

The following outlines how we will work as a Service towards meeting our Prevent Duty:

- P** – Promotion of Equality and Diversity and positive relationships between students
- R** – Referral of any concerns via Designated People to relevant authorities
- E** – Education for students on all courses
- V** – Vetting and removal of any posters or materials of an extremist nature
- E** – Environment – safe and secure sites with safeguarding procedures and online filters
- N** – News monitoring for any concerns in the locality
- T** – Training of staff to raise awareness of the signs and risks

Any concerns relating to the Prevent Duty need to be raised with a Designated Person as per the Safeguarding Policy.

### **Equality and Diversity**

Medway Adult Education actively promotes Equality and Diversity.

### **Promoting British Values**

An element of the Prevent Strategy also includes positive promotion of British Values, namely: democracy, rule of law, individual liberty, tolerance and respect for others. Medway Adult Education are committed to promoting these values.

Further information can be found in the Safeguarding area of Medway Adult Education's Moodle

## Appendix 7: Safeguarding Annex: Distance Learning

Medway Adult Education is committed to providing a high quality and safe experience to our learners through distance learning. While guidelines about course design and structure, monitoring the quality of teaching and learning, staff and learner support and learner engagement are currently under development. There is an expectation that:

- Learning materials are of a high standard, relate to the intended course learning outcomes and are inclusive, current and accessible to distance learners.
- Learning materials used, including pictures and videos, comply with copyright restrictions.
- Where possible complex ideas are presented in more than one format and/or approach to support different learning styles.
- Activities consolidate learning and contribute to learners' wider skills development.
- Further relevant reading and development opportunities are signposted.
- Tutors are mindful that not all learners will be able to afford or use the required technology.
- Learners and tutors must be mindful of what can be seen in the background when using webcams and all must be appropriately dressed

### Staying Safe Online

Staff and learners are recommended to read the advice and information for families and individuals on the National Cyber Security Centre website:

<https://www.ncsc.gov.uk/>

This includes top tips for staying safe online and how to protect your data and devices.

Learners:

- Are reminded that tutors are unable to provide individual live learning through online platforms
- Must not record live classes, events, demonstrations or meetings.

### Confidentiality, Information Sharing and GDPR

MAE must ensure that it can demonstrate full compliance with the principles of the General Data Protection Regulation (GDPR). All staff are required to be familiar with GDPR Data Protection available on Moodle or from their line manager. Any data breach or suspected data breach must be referred immediately to the senior management and Funding Manager.

## **Safeguarding - Communicating Electronically Policy**

This policy is intended for all who work with supported learning learners and mainstream learners within Medway Adult Education, whether paid or voluntary. It is also for tutors to raise their awareness of the issues around electronic communications that could be affecting their learners. The whole policy is important, but **please note especially** the Golden Rules on Page 38 of appendix 8.

### **Rationale**

As social media, mobile phones, emails and the internet are all efficient and easily accessed, we believe that it is important that safeguards are put in place by the Medway Adult Education to ensure safety and accountability. MAE communications via electronic means should be professional and separate from private communications.

Vulnerable people often find it easier to communicate electronically rather than face-to face, which could give them a false sense of security and they could overshare more than if talking in person. As abusers know this they often start with electronic communications in order to bully, groom or lure into an unprotected face-to-face meeting.

Medway Adult Education is aware of these issues as part of safeguarding and this policy has been adapted from gov.uk safeguarding guidance to ensure that those who supervise and work with all learners mainstream and Supported Learners know what to do or not do and to hold themselves accountable.

### **Potential Issues**

#### **Cyberbullying**

Bullying can now happen via text, social media and email. Tutors should be alert to the signs that this could be happening to any learner or vulnerable adult. The Learner could:

- Become withdrawn, anxious, diminishing in confidence
- Become aggressive, abusive, disruptive or unreasonable
- Change their routine
- Start to bully others
- Be afraid/reluctant to use internet or mobile phone
- Be nervous or 'jumpy' when a cyber-message is received

#### **Texting**

This is one of the most used methods of communication but is difficult to monitor.

**Tutors using this method of communication must be accountable for what is said.**

Ideally, a work mobile phone should be used.

- Texts should only be sent to learners within the hours of 8am to 6pm.

- All texts should be kept – nothing should be deleted - in order to provide clarity.
- Tutors should be aware that they might be asked to allow MAE Safeguarding Officer to see their texts to/from a learner on – whether this is on a work mobile phone or on their own personal phone – this is also to provide accountability.
- Where possible, send group texts or emails, rather than to individuals.

### **Sexting**

This has been defined as “the creating, sharing and forwarding of sexually suggestive nude, or nearly nude, images” (Lenhart 2009). So this is taking a sexually explicit image and/or text and sharing it via a mobile phone to others.

### **Making, possessing or distributing an indecent image of a child (under 18) is a crime.**

It is easy to distribute sexually explicit content using smartphones, the internet or social media. It is illegal and it is seen as committing a criminal offence to:

- make an indecent image of a child (themselves)
- possess an indecent image of a child
- distribute an indecent image of a child.

Tutors and staff also need to be aware of other dangers and problems that can follow on:

- Once sent, they have no control over further distribution of the images
- They can be the target of cyberbullying
- They can be the subject of grooming by a sexual predator
- This can lead to serious mental health issues caused by fear of what might happen, leading to depression, self-harm and contemplating suicide.

### **Social media**

These are online tools used to communicate and engage with other people including:

- Writing or commenting on blogs
- Micro-blogging (e.g. Twitter)
- Personal profile pages on networking sites (e.g. LinkedIn, Facebook, Google+, Google Meet, Zoom )
- Using specifically designed Apps (e.g. Snapchat, WhatsApp, Messenger)
- Reviews of products or services on retailer sites/customer review sites
- Taking part in online votes, polls or surveys
- Taking part in conversations on both public and private web forums (message boards)

**If tutors choose to use this method of communication, great care needs to be taken in order to avoid crossing boundaries into the private lives of tutors or members of staff from Medway Council.**

- Do not take or post images without express consent of the learner (carer or care home). Unless explicit permission is given in writing for a particular purpose, (e.g. to be posted on MAE website) do not share these on public forums. The learner also needs to be happy to have the image posted.
- Ensure that privacy settings allow only approved friends (i.e. members of the group) to message or add people as a friend – these should also be members of the group.
- If an app such as WhatsApp is used to communicate with a group of learners the Safeguarding Officer or PM should be included as a member of the group to ensure accountability.

## **Golden Rules for Tutors / Staff /Volunteers**

- Always obtain the learners consent before using any electronic method of communication
- Use clear unambiguous language that cannot be misinterpreted, eg don't sign off with 'luv', 'xx' 'lol' or similar
- Use a friendly but not over-familiar or personal tone
- Content of messages should relate only to the group/class attended
- To ensure accountability tutors should be aware that they might be asked to allow MAE Safeguarding Officer to see their texts to/from a learner on – whether this is on a work mobile phone or on their own personal phone.
- Send group texts/emails, not individual ones
- Any electronic communications which raise concerns must be shared promptly with Medway Adult Education including the Programme Manager and the Safeguarding Lead depending on the nature of the communication.
- All electronic communications involving learners should be sent/responded to within set time boundaries (i.e. not between 6pm and 8am}
- Not everyone will have access to a mobile phone/computer so ensure other methods of communication are also considered too.
- Images should only be taken/shared with consent. These should be stored securely in accordance with Data Protection and not on mobile phones. This includes images on social media sites or on 'YouTube'

**Remember that, legally, if a conversation/comment is accessible to even one more person it is deemed to be published information and in the public domain, and therefore subject to libel, defamation, data protection and copyright laws.**

### **Concerns**

If a learner, tutor, LSA or volunteer becomes concerned about the content of a conversation on a social media site, the following action should be taken:

- If someone is at risk of immediate harm, dial 999 (e.g. if you believe that a young person is on their way to meet someone from the internet who is likely not to be genuine)
- Don't close down the conversation as this could potentially lose any evidence
- Always seek help and advice first – Preserve any 'paper trails'. If necessary copy and paste any conversations and have these witnessed, sign and dated.

### **Information and Support**

Advice for Tutors / Staff / Carers on cyberbullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

## **Appendix 8: Digital Loans Acceptable Use Agreement**

### **I understand and agree that:**

- MAE will monitor my use of the systems, devices and digital communications.
- I will keep my username and password safe and secure – I will not share it, nor will I try to use any other person's username and password. I understand that I should not write down or store a password where it is possible that someone may steal it.
- MAE systems and devices are primarily intended for educational use and that I will not use them for personal or recreational use unless I have permission.
- I will not disclose or share personal information about myself or others when on-line.
- I will immediately report any unpleasant or inappropriate material or messages or anything that makes me feel uncomfortable when I see it on-line.
- I will not use the MAE systems or devices for on-line gaming, on-line gambling, internet shopping, file sharing, or video broadcasting (eg YouTube).
- I will respect others' work and property and will not access, copy, remove or otherwise alter any other user's files, without the owner's knowledge and permission.
- I will be polite and responsible when I communicate with others, I will not use strong, aggressive or inappropriate language and I appreciate that others may have different opinions.
- I will not take or distribute images of anyone without their permission.
- I understand the risks and will not upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others, nor will I try to use any programmes or software that might allow me to bypass the filtering/security systems in place to prevent access to such materials.
- I will not open any hyperlinks in emails or any attachments to emails unless I know and trust the person/organisation who sent the email (due to the risk of the attachment containing viruses or other harmful programmes).
- When using the internet for my course I must ensure that I have permission to use the original work of others in my own work.
- I am responsible for my actions, both in and out of MAE premises:
- MAE has the right to take action against me if I am involved in incidents of inappropriate behaviour, that are covered in this agreement, when I am out of MAE premises and where they involve my membership of the MAE community (examples would be online-bullying, use of images or personal information). Please be aware that any inappropriate or illegal activity will be reported to the relevant authorities.
- I am responsible for taking reasonable care of the equipment and provided accessories (eg, mouse, power pack, laptop bag) during the loan period.
- I understand MAE reserves the right not to replace damaged, lost or stolen equipment.



- I will immediately report any damage or faults involving equipment or software to MAE, however this may have happened and under no circumstances, will I, or anyone other than MAE staff, attempt to fix suspected faults or damage.
- I understand that MAE will not accept responsibility for the loss of work in the event of the equipment malfunctioning.
- Only software licensed and installed by Medway Adult Education will be used on the equipment.
- I will not install or attempt to install or store programmes of any type on any MAE device, nor will I try to alter computer settings inappropriately.
- I will ask my tutor or a member of MAE staff if I do not understand any of the information.

**End of document.**