



# Safeguarding & Prevent Policy & Procedure

## Contents

1. Definitions	Page 2
2. Policy Statement	Page 5
3. Responding to a disclosure	Page 8
4. Confidentiality	Page 9
5. Partnerships and External Structures	Page 10
6. Malicious or unsubstantiated allegations	Page 10
Appendix 1 - List of useful names and contact details	Page 11 & 12
Appendix 2 - Antrec Limited Safeguarding Adults Policy	Page 13
Appendix 3 – Referral Documentation	Page 16
Appendix 4 – Referral Flow Chart	Page 20
Appendix 5 – Code of Conduct	Page 21

## Definitions

### People responsible for safeguarding & prevent in Antrec Limited

People with responsibility for issues relating to the safeguarding of vulnerable adults in Antrec Limited are referred to in this document as “safeguarding & Prevent team or leads”, “Prevent Strategic Lead” or “designated manager”. A list of names, titles and contact details for these managers, other relevant members of staff and other relevant agencies is attached at Appendix 1.

### Who is an adult at risk?

An adult at risk/vulnerable adult is anyone aged 18 and over who:

- has needs for care and support
- is experiencing, or at risk of abuse or neglect
- is unable to protect themselves against significant harm or exploitation

Department of Health, “No Secrets”, 2000

### 1. Purpose of the Policy

This policy states the responsibilities of Antrec in relation to Safeguarding children and vulnerable adults, in response to current legislation and guidance.

The policy and procedures applies to all students, staff, providers of services to Antrec including volunteers and contractors, and all other users of the organisation.

The policy and procedures are intended to safeguard all of the students and provide for Antrec to discharge its legislative obligations to protect vulnerable adults.

Antrec learners are all 18+ however, in line with current legislation any disclosure or suspicion of abuse to a child associated with the adult learner will be reported in the same way.

In terms of this policy, ‘child’ or ‘children’ means those under the age of 18 as defined by the Children Act of 1989.

### 2. Legal Framework

Antrec is not an investigating agency. This function is carried out by the local authority’s Safeguarding team, or other agencies with statutory powers.

The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18.

However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and also that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

### 3. Definitions

All staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of individuals who may be in need of help or protection. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of an adult at risk or a child, staff members should always act in the interests of the individual. There are various expert sources of advice on the signs of abuse, neglect, radicalisation, exploitation and extremism. Knowing what to look for is a vital part of our role. If staff members are unsure they should always speak to the safeguarding team, or the local safeguarding team.

If Antrec receives information about an adult student (18 plus) which suggests that he/she has been abused or that it is likely, or is at risk of radicalisation or showing extremist behaviour, it has a duty to refer these concerns to the local Safeguarding Board and/or the Police. If Antrec is unsure whether a referral is necessary, staff will consult with appropriate Agencies for guidance.

Throughout this document the following definitions apply:

**Child** – in accordance with The Children Act 1989, (and also in the Children Act 2004) and therefore, in accordance with the law, Antrec shall regard any learner below the age of 18 as a child.

**Young people aged 18+** - may in some circumstances be regarded as vulnerable as a consequence of earlier life-experience and may therefore fall within the remit of The Children Act 1989. Antrec will take action based on individual situations; for example, where a learner is over 18 but wishes to report abuse which took place when they were younger or if there are younger siblings in a family who are thought to be at risk.

**Vulnerable Adult/Adult at Risk** – is or may be in need of Community Care Services by reason of mental or other disability, age or illness and is, or may be, unable to take care of himself or herself, or unable to protect himself or herself against significant harm or serious exploitation. Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

**Abuse** - may be physical, sexual, emotional, neglect, domestic violence, financial, institutional or discriminatory. Behaviour which deliberately or unknowingly causes harm. Abuse can be passive i.e. failure to care for someone, take action or alert about abuse. Abuse can be an isolated event or repeated.

**Significant harm** - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)



**Physical abuse** - actual or likely physical injury, or failure to prevent injury. May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint or inappropriate sanctions or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

**Sexual abuse** - actual or likely sexual exploitation, including prostitution. Involving forcing or enticement to take part in sexual activities whether or not the individual is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the child/vulnerable adult looking at or being involved in the production of, pornographic material or watching sexual activities, or encouragement to behave in sexually inappropriate ways. Can include grooming in preparation for abuse. It is recognised that sexual abuse can take place within a relationship whether heterosexual or same sex, or outside of a relationship. Can include rape and sexual assault or sexual acts to which a vulnerable adult/child has not consented, or could not consent to, or was pressured into consenting to.

**Emotional abuse** - emotional abuse is the persistent emotional ill treatment as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning, or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

**Psychological abuse** - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse or isolation.

**Neglect** - neglect is the persistent failure to meet a child or vulnerable adults basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting them from emotional harm or danger. Neglect and may include acts of omission which includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing and heating.

**Self-neglect** - is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.



**Risk to self and/or others** – This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress and mental health issues.

**Domestic Violence** – can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour based violence.

**Radicalisation** – vulnerable individuals being targeted for recruitment into extremism.

**Financial or material abuse** - includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions or benefits.

**Discriminatory abuse** - includes racist, sexist, or discrimination based on a person's disability.

**Safeguarding** - includes promotion of health and well-being as well as protection of specific individuals

## Policy Statement

It is the responsibility of everyone within Antrec to ensure the safety and wellbeing of our students.

It is everyone's responsibility to understand how to recognise, respond to, report, record and refer any concerns about the welfare of an individual student as appropriate.

We are committed to a positive policy of equal opportunity and strives to support students wherever possible and create an environment that is safe and welcoming.

Antrec recognises that it has a duty of care to students, staff and stakeholder and endeavours to ensure that their wellbeing and health and safety are a priority.

## Creating a Safe Environment.

To create a safe environment for students, Antrec will;

- ▲ Operate a 'zero tolerance' approach to weapons, drugs, alcohol and bullying, including cyber or electronic bullying, in all forms
- ▲ Have clear procedures for following up issues of conduct for both staff and students
- ▲ Continually review the safety and security in our centres e.g. ID Badge
- ▲ Ensure all staff, including volunteers, have an appropriate DBS and other checks, frequent visitors will receive an induction
- ▲ Ensure all staff, students and visitors wear ID Badges at all times

Provide training and support for staff.

All staff will be given up to date information on Safeguarding & Prevent through;

- ▲ A clear induction programme, which includes Safeguarding & Prevent
- ▲ Additional advance training which will be provided for staff with specific responsibility for student wellbeing
- ▲ Taking part in appropriate Safeguarding & Prevent Training, in line with specific job roles
- ▲ Being made aware of the Antrec's Policy and Procedures on Safeguarding & Prevent
- ▲ Being offered other relevant suitable training / information, as and when appropriate
- ▲ Being provided with contact details for the relevant safeguarding staff

**Positive Promotion.** Safeguarding and welfare support, will be promoted positively throughout Antrec in a number of ways, including;

- ▲ Policies and Procedures available on our website
- ▲ Monitoring of attendance
- ▲ Student Induction
- ▲ Equality and Diversity, Prevent, Health and Wellbeing, Anti Bullying, E-Safety promotion and information throughout the academic year
- ▲ Ensure Safeguarding is included within the 'Learner Voice' process.
- ▲ Information awareness raising days will be responsive to local and national trends
- ▲ Student Welcome Pack (Student Induction/Information Leaflet)
- ▲ Awareness-raising posters
- ▲ External agencies partnerships

**Support for Students.**

Students will be offered support through a number of mechanisms in Antrec including;

- ▲ Safeguarding Officers who will deliver timely interventions or appropriate support to our most vulnerable learners
- ▲ Learning Support for students with learning difficulties / disabilities and / or medical needs
- ▲ Links developed with external agencies, including agencies linked to specific groups such as Merseyside Police Prevent Team, Mental Health Services & MASH. We acknowledge that the best outcome for vulnerable adults/adults at risk are achieved by adopting a multi agency approach, where professionals work effectively in partnership.
- ▲ Measures to support students and staff at risk of being drawn into radicalisation
- ▲ Considering the needs of the individual and responding as far as possible
- ▲ Relevant Criminal Conviction (RCC) Risk Assessments – new / re-enrolling applicants

**Designated staff with responsibility for safeguarding**

The Managing Director will ensure that:

- ▲ The policies and procedures adopted by the are fully implemented and followed by all staff.
- ▲ Sufficient resources and time are allocated to enable the Safeguarding Lead and other staff to be able to perform their duties.

- ▲ All staff and volunteers feel able to raise concerns about poor practice, and concerns are addressed sensitively and effectively in a timely manner.
- ▲ The designated senior person (DSP) with lead responsibility for safeguarding and Prevent the protection of vulnerable adults is the Quality Assurance Manager
- ▲ The post holder has a duty to take lead responsibility for raising the awareness of staff of issues relating to the wellbeing young people and vulnerable adults, and the promotion of a safe environment young people and vulnerable adults enrolled with Antrec, in respect of vulnerable adult protection.
- ▲ The post holder will receive training in vulnerable adult protection issues and interagency working, and will keep up to date with developments in Prevent and Vulnerable Adult protection procedures.

The Safeguarding & Prevent Lead is responsible for:

- ▲ Promoting positive safeguarding procedures and practice
- ▲ Raising awareness of safeguarding issues among staff and students
- ▲ Providing advice and support to other staff on issues relating to safeguarding, Prevent and adults at risk/vulnerable adult protection
- ▲ Ensuring that all students can view the Safeguarding Policy
- ▲ Liaising with staff responsible for work experience, work placements, curriculum development & guest speakers or external training to ensure that safeguards are put in place to protect our students.
- ▲ Ensuring that all staff receive basic training in vulnerable adult protection and Prevent and are aware of the Antrec's Safeguarding and Prevent protection procedures.
- ▲ Keeping all staff informed of good practice and developments
- ▲ Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- ▲ Maintaining robust records of safeguarding incidents and follow these up until the closure point.
- ▲ Ensuring Antrec has a robust system for monitoring vulnerable students
- ▲ Overseeing the referral of cases of suspected abuse on to Social Services, Channel, the Police and the Local Vulnerable Adult Unit.
- ▲ To work with Prevent to provide training and gather relevant timely information and guidance.

### Designated Staff Members

Other designated members of staff with responsibility for safeguarding and child and vulnerable adult protection are the Managing Director and Safeguarding Officers (SO) and are trained and able to deal with any safeguarding issues and make full referrals. The DSP must be kept abreast of any referrals made.

Responsibility of Safeguarding Officers:

- ▲ To report to the DSP any child or vulnerable adult concerns as and when they arise.
- ▲ To know how to make an appropriate referral
- ▲ To be available to provide advice and support to other staff on concerns relating to Prevent and adults at risk/vulnerable adult protection
- ▲ To be available to listen to the concerns of individuals
- ▲ To make referrals and review meetings as appropriate.





- ▲ To receive level 3 training in child and vulnerable adult protection issues and Prevent training

The SMT will:

- ▲ Oversee and review Antrec's Safeguarding & Prevent Policy and Procedures including linked policies.
- ▲ Raise awareness of developments in Safeguarding good practice and links to Prevent, Equality & Diversity and Health and Safety.
- ▲ Ensure the quality assurance of provision of safeguarding information, advice and guidance.
- ▲ Ensure compliance with national standards

### Monitoring and Review

Implementation of this policy will be monitored annually or earlier should legislation or national guidance change.

### Supporting Documentation

The following documents provide links to this policy:

- ▲ Equality and Diversity Policy
- ▲ ICT Acceptable Usage Policy
- ▲ Recruitment and Selection Procedure
- ▲ Code of Conduct

This policy and related procedures are driven by the following legislation and guidance:

- ▲ Children Act 2004
- ▲ Dealing with allegations of abuse against teachers and other staff – Department for Education 2012
- ▲ Equality and Diversity Act 2010
- ▲ Safeguarding Vulnerable Groups Act 2006
- ▲ Excellence Gateway – Safeguarding, 2009
- ▲ Vetting and Barring Scheme – Update. Independent Safeguarding Authority, 2009
- ▲ Contest (The National Counter-Terrorism Strategy)
- ▲ Counter-Terrorism and Security Act 2015
- ▲ Prevent Duty Guidance: for further education institutions in England and Wales





## Responding to a disclosure or suspicion of abuse or concern that someone may be on the route to radicalisation or might be at risk of extremism.

Any member of staff who has knowledge of or a suspicion that, a child / vulnerable adult is or has been suffering significant harm or concern that someone may be on the route to radicalisation or might be at risk of extremism must refer their concern to a Safeguarding Officer as soon as possible but within 24 hours at the latest. They must also pass any written notes to the Safeguarding Officers and not retain any written information. All allegations or suspicions must be taken seriously. The student must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff, in the first instance.

The person who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:

- ▲ date and time of report
- ▲ your name and name of complainant
- ▲ name and DOB of adult at risk/vulnerable adult alleged to have been abused or at risk of extremism or radicalisation.
- ▲ nature of alleged concern or disclosure
- ▲ description of any injuries observed, if any
- ▲ any other information given, including siblings if relevant (their full names and DOB if possible)
- ▲ confirmation that the student has been advised of the next steps

Questions should be kept to the minimum required for clarity, and leading questions must be avoided.

If uncertain about any situation, advice (which should be documented) should be sought from relevant organisations, for example from Police, Children's Services, Adult Care Services etc.

If none of the named managers can be contacted within two hours of the initial concern arising, the member of staff making the report should contact the local safeguarding team (Appendix 1) and notify the Safeguarding Lead as soon as possible about the action taken.

If a student is in immediate danger or at risk of serious harm, for example in a life threatening situation, call the emergency services by dialling 999. You must then communicate the information to the appropriate manager/s (see appendix 1)

Where a student has been found to be at physical risk on Antrec Limited premises, the Director should be informed immediately

A flowchart describing the referral process is attached at Appendix 4.

At no point should Antrec Limited staff undertake any investigatory interviews.



Written Records - The designated member of staff shall retain a copy of:

- ▲ Any notes, memoranda or correspondence dealing with the matter
- ▲ Any other relevant material

Copies of reports, notes etc should be kept securely locked at all times, and kept for a period of 7 years

### Work Based Learning

Antrec will hold Safeguarding Policies and details of designated persons for all partner organisations and subcontractors.

All learners, regardless of their learning programme, will receive an induction, which includes contact details for the Safeguarding Officers. The understanding of all aspects of Safeguarding (including prevent) and safe working practices is checked at each review and the opportunity to discuss any issues is given.

In accordance with this policy, assessments are made to ensure that the learner's wellbeing is safeguarded by the work placement team. Antrec has arrangements in place to ensure that, prior to work related work commencing:

- Pre-placement Health and Safety checks of employer's premises and health and safety management arrangements are complete, including insurance details
- Consents are obtained
- Employers are made aware of our relevant policies
- The requirements for DBS checks are assessed and undertaken where required

Background checks on the suitability of the placement, in line with The Equality Act 2010 and guidance on Safeguarding and Prevent.

### Confidentiality

#### The Basic Principles

As a fundamental principle, staff will offer a confidential service to learners using our company, with information only being disclosed with the learner's consent or where there are legal requirements to do so.

The boundary of confidentiality for each staff member is that information is only passed to somebody who is authorised to receive it from someone who is authorised to disclose it. Regarding disclosure or sharing information, the main principle to be observed is that any disclosure should be kept to a minimum and on a need to know basis (the minimum necessary is the maximum permissible).

#### Limits to Confidentiality

Staff cannot offer or guarantee absolute confidentiality to any learners in the following circumstances:

- a) where safeguarding issues are involved;
- b) where there is significant threat to life (the student's own life or someone else's);
- c) where a person needs urgent medical treatment; and or
- d) where potential or actual serious criminal offences are involved



Limits to confidentiality will be made clear to learners at the earliest opportunity. Where confidentiality has to be broken, the staff member should seek to ensure that the learner is informed first or as soon as possible afterwards.

The Safeguarding Team have an open door policy for any staff who wish to discuss their concerns, staff will need to be mindful that the Safeguarding Team cannot as with students give absolute confidentiality to any disclosures.

#### Working with other providers/sub-contractors

Where Antrec Limited subcontracts with other organisations to work with vulnerable adults, the School or Service responsible for managing the contract will ensure the following:

Safe recruitment and staff monitoring policies are in place in line with Antrec policies. For example, all staff appointments are made subject to:

- 1) Satisfactory references
  - 2) Satisfactory DBS Disclosure
- ▲ Until these references and reports have been received new staff are not allowed to work alone and without supervision with adults at risk/vulnerable adults.
  - ▲ All staff working with vulnerable adults are trained in line with the Antrec Limited Policy on the Safeguarding of Vulnerable Adults
  - ▲ The subcontracted organisation has best practice/policy in place to ensure the personal safety and well-being for vulnerable adults

#### Malicious or unsubstantiated allegations

Where it is subsequently found that an allegation was made with malice aforethought, the SMT will determine an appropriate course of action. This may include disciplinary action against the accuser, acceptance of a written apology (subject to agreement about future behaviour) or other such sanctions as are deemed appropriate.

#### Proportionate responses to perpetrators of false or unsubstantiated allegations

- ▲ Despite the distress caused, vulnerable adults who make false allegations may still be entitled to continue to receive full access to the curriculum
- ▲ Where remaining in the same organisation as the falsely accused member of staff would be prejudicial either to that member of staff or the vulnerable adult, consideration should be given to supporting the vulnerable adult to identify suitable education or training opportunities elsewhere
- ▲ Permanent exclusion should be considered only as a last resort



## Safeguarding &amp; Prevent Procedures – List of Useful Names and Contact Details

## ANTREC LIMITED – Internal Contacts – Update

Name	Title	Organisation	Tel. Number
<b>ANTREC LIMITED DIRECTOR</b>			
Nicola Lee	Managing Director of Antrec Limited	Antrec Limited	0333 023 7457 07821 452448
Andrew Lee	Director of Finance	Antrec Limited	0333 023 7455 07834 275705
<b>SAFEGUARDING LEAD &amp; PREVENT STRATEGIC LEAD</b>			
Natalie Taylor-Buck	Quality Assurance Manager – Safeguarding Lead	Antrec Limited	0151 3305915 07415 881644

Other useful contact details – external  
North West OpsLiverpool

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit Prevent Coordinator	Police Contact
0151 233 3800	0151 233 3800	Careline	101
0151 233 7015 07856645524	sue.harris3@liverpool.gov.uk	Sue Harris - Prevent Coordinator	101

Sefton & Merseyside

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit Prevent contact	Police Contact
0151 709 6010 07732457710	Joan.Coupe@sefton.gov.uk	Sefton MASH – Joan Coupe	101
0151 777 8433 07738690834	Declan.A.Sammin@merseyside.police.uk	Declan Sammin	101



**North East  
NEWCASTLE**

First Contact point for all alerts	Out of Hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
01912788156	0191 2787878	0191 2788156	101 ext 45187

**NORTH TYNESIDE**

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
0191 6437078	0191 2006800	0191 6432777	101 ext 45223

**NORTHUMBERLAND**

First Contact for all alerts	Out of hours (after pm)	Safeguarding Adult Unit/Coordinator	Police Contact
01670 536400	08456005252	01670 536400	101 ext 45138

**SOUTH TYNESIDE**

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
0845 1304959	0191 456 2093	0191 422 4049	101 ext 66975

**SUNDERLAND**

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
0191 5618934	0191 5205552	0191 5618950	101 ext 66975

**DURHAM**

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
03000267979	03000267979	03000267979	101 ext 66975

**GATESHEAD**

First Contact for all alerts	Out of hours (after 5pm)	Safeguarding Adult Unit/Coordinator	Police Contact
0191 433 7033	0191 433 7033	0191 4337033	101 ext 66975



## Appendix 2

### ANTREC LIMITED Safeguarding of Vulnerable Adults Policy

Accessible to Students/Customers: Yes

#### Scope and Purpose of Policy

This policy and the associated procedure have been developed in response to guidance issued on the protection of vulnerable adults in the DfES/NIACE publication "Safer Practice, Safer Learning"(2007). The guidance applies to all education providers of post-16 learning and skills.

In England, Wales and Northern Ireland there is no definition of a vulnerable adult in statute, however, the broad definition of a vulnerable adult is a person who:

"Is eighteen years of age and over, and who may be in need of community care services by reasons of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation".

*Department of Health, "No Secrets", 2000*

Vulnerability may be a permanent or temporary state and may encompass someone who is vulnerable for a fixed period in their life. Such an example may be somebody suffering from domestic abuse.

This policy also applies to Scotland which has different legislation

"The Protection of Vulnerable Groups (Scotland) Act 2007 which defines a protected adult as "an individual, aged 16 or over who receives one or more types of care or welfare services".

#### Policy Statement

Adults have the right to access education and training free from fear of harm and protected from mistreatment and abuse. In addition, vulnerable adults should be able to access learning with as much independence as is appropriate and within their capabilities and to make choices, even if those choices involve a degree of risk. Where a risk is identified, a risk assessment will be completed.

Antrec Limited recognises its role in safeguarding vulnerable adults and in the prevention of mistreatment or abuse. In accordance with DfES/NIACE guidance, the following arrangements apply to Antrec Limited:

Antrec Limited safeguarding vulnerable adults policy applies to all services and is made available to parents, carers, guardians, learners and customers on request;

Procedures are developed and updated within the framework attached at Annex 1. These procedures are:



- ▲ developed in accordance with local authority guidance and locally agreed interagency procedures;
- ▲ include guidelines for dealing with allegations of abuse against members of staff and volunteers;
- ▲ reviewed and updated annually;

Antrec Limited operates safe recruitment procedures and ensures that all appropriate checks are carried out on staff and volunteers who work with Vulnerable Adults;

Antrec Limited Director and Antrec Limited Designated Manager will lead responsibility for dealing with Vulnerable Adult protection issues and provides advice and support to other staff within Antrec Limited;

The Director identifies a Designated Safeguarding Lead who is responsible for Vulnerable Adult protection issues within Antrec Limited;

In addition to basic Vulnerable Adult protection training Antrec Limited Director and Designated Manager, are required to undertake appropriate training determined by their operation role to standards agreed by the Local Safeguarding Boards and refresher training at two yearly intervals to keep his or her knowledge and skills up to date.

The Antrec Limited Director and Designated Manager and all other staff who work with Vulnerable Adults, are required to undertake appropriate training to equip them to carry out their responsibilities for Vulnerable Adult protection effectively, that is kept up to date by refresher training at two yearly intervals;

The Antrec Limited Director and Designated Manager ensures that the training described above is offered and undertaken at the prescribed intervals and that staff training records are up to date;

All staff are required to comply with the Code of Conduct applicable to Antrec Limited; Antrec Limited remedies without delay any deficiencies or weaknesses in regard to Vulnerable Adult protection arrangements that are brought to its attention;

The safeguarding lead is nominated to be responsible for liaising with the local authority and/or partner agencies, as appropriate in the event of allegations of abuse being made against any staff;

Policies and procedures are reviewed annually by Antrec Limited designated manager and information is provided to the Director about how the above duties have been discharged;

All complaints, allegations or suspicions are taken seriously and discussed with the Designated Safeguarding Lead and/or Antrec Limited designated manager before any steps are taken. Where action is necessary, this will be undertaken with due regard to the Vulnerable Adult Protection Procedure.



## **Equal Opportunities Statement**



The policy is written with due regard to Antrec Limited commitment to Valuing Diversity. However, where there are concerns about a Vulnerable Adult's welfare, this will take priority. An Equality Impact Assessment will be completed by Antrec Limited.

## **Location and Access to the Policy**

The Policy is located as follows:

Antrec Limited Policies on AntrecLive Systems – Student Area and Staff Area

## **Person Responsible for the Policy**

Antrec Limited Safeguarding and Prevent Strategic Lead


**Safeguarding Adults Multi-agency Alert Form**

*This form has been split into four parts. Please read the header for each section to see which section you need to complete. Part C requires a signature for all staff involved in the incident.*

<b>Part A – To be completed by member of staff who was first made aware of incident</b>			
Date			
Name of Learner			
Date of Birth		Student ID Number	
Staff member who made referral		Department and contact number	
Date and time alleged incident took place			
Any immediate treatment required i.e. first aid			
Description of any injuries			
Anyone else present at time of incident?			

Version of events  
(in chronological order)





<b>Part B – To be completed by designated manager whom incident was reported to</b>	
Any external agencies informed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If yes provide contact details and date and time of communication (please provide details of any child protection referrals made to local authority or safeguarding adults multi agency form SAMA1)	
Details of Action Taken (Date, Time and Persons involved/contacted)	
<b>Part C – To be signed by all staff involved in safeguarding incident</b>	
Staff Signature	
Date	
Designated Manager signature	
Date	
<b>Part D - For safeguarding recording only</b>	
Date Logged on database	
Evidence saved in Safeguarding Folder	
Any further documentation	



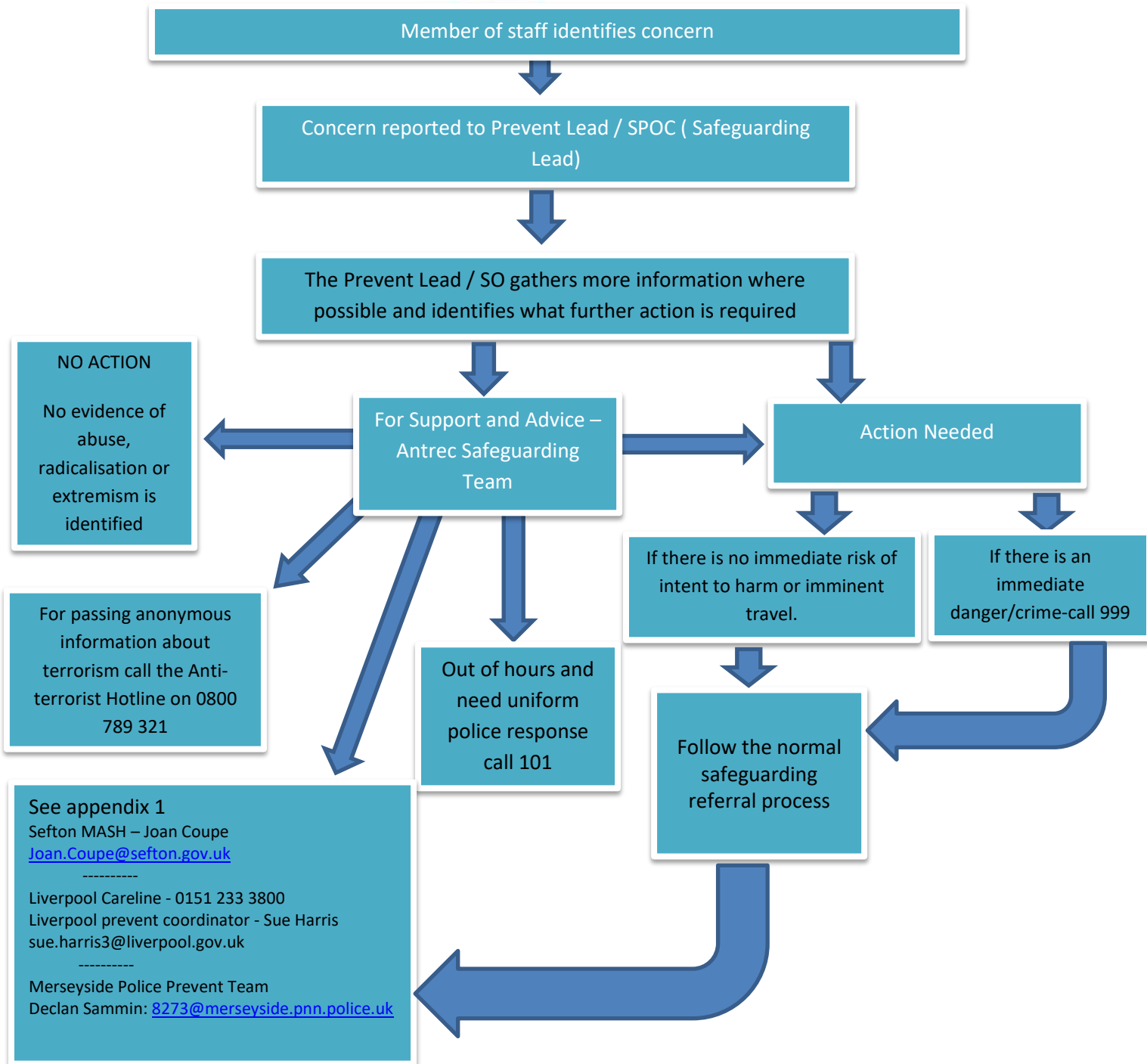
## Information about how this document should be sent safely and securely

Once completed, this document contains personal and sensitive information and is classified as “restricted” under the Government’s Protective Marking Scheme.

### Sending the information to Adult and Culture Services

- The SAMA1 should not be sent to Adult Services or Prevent Services without first telephoning and speaking to Adult Social Care Direct/allocated Social Worker/Out of Hours Service.
- Following the telephone conversation there should be agreement on **how** and **who** the SAMA1 form is going to be sent
- **Under no circumstances should the SAMA1 be sent without first confirming these details.**
- **Post.** The documents should be sent via recorded delivery in external post. Documents should be double enveloped. On the outer envelope it should clearly state “To be opened by named addressee only”. There should be a return address on the outer envelope. The inner envelope should be marked “restricted”.
- **Do not use internal post.**
- **Delivery in person.** Do not use internal post. SAMA1 should be hand-delivered. You should obtain a signature from the intended recipient to confirm delivery.

**Appendix 4**



## Appendix 5

### Code of Conduct for Staff working with Vulnerable Adults

This code has been written to assist staff in maintaining proper and professional relationships with vulnerable adults.

As an employee of Antrec Limited staff are required to demonstrate high standards in their exercise of authority, their management of risk, and the active protection adults at risk from discrimination and avoidable harm. This document is designed to be useful for staff to provide a safe environment for adults at risk and in avoiding situations that might lead to allegations against them.

Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with adult at risk remains, and are seen to remain, entirely proper and professional. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with adults at risk and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and proper associations that staff may have with them.

Many staff have a close working relationship with a number of adults which contributes to the quality of provision offered to this group of learners. The guidelines outlined below are not intended to make members of staff unduly anxious about working with adults at risk but are, in fact, intended to give them confidence in offering guidance on appropriate behaviour and a professional approach.

### Recruitment of Staff

All staff appointments are made subject to satisfactory references and enhanced DBS through the Disclosure and Barring Service

Until these references and reports have been received new staff are not allowed to work alone and without supervision.

### Staff Training

All new employees will undergo the Antrec Induction Programme which will include the Safeguarding & Prevent Policy, Procedure and Protocols.

All existing employees will undergo training on the Safeguarding & Prevent Policy, Procedure and Protocols

All staff working with adults at risk, where appropriate, must undergo training in: Safeguarding on an annual basis.





## **Key principles for the Safeguarding Adults at Risk**

All adults risk, whatever their age, gender, racial origin, culture, religious belief and/or sexual identity have the right to be treated with respect, have their dignity maintained and an entitlement to protection from mistreatment and abuse. All vulnerable adults have the right to access learning with as much independence as is appropriate and within their capabilities, and to make choices, even if those choices involve a degree of risk (as long as the procedure on Risk Assessment is adhered to).

All incidents and allegations or suspicions of abuse or radicalisation or extremism should be taken seriously and responded to swiftly and appropriately.

## **Good Practice Guidelines**

All staff will be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations. Some examples are below:

Encourage an open environment – no secrets.

Be mindful of where you work with an adult at risk and of the potential risks which may arise from working in private. For example, when challenging a student about their extreme views, ensure you are in pairs so one person can witness what is happening.

Treat all vulnerable adults with respect and dignity.

Maintain a safe and appropriate distance.

As a general principle, staff should not have unnecessary physical contact with vulnerable adults. There may be very limited occasions when a learner needs comfort or reassurance, which may include physical comforting. Any such comforting gestures must always be acceptable to the person concerned. A member of staff should be aware, however, that any physical contact may be misconstrued by a learner, parent/carer or observer.

Staff who administer first aid should ensure wherever possible that another adult is present, if they are in any doubt as to whether necessary physical contact could be misconstrued.

Where it is necessary to assist with personal care, for example, toileting or supervising dressing or undressing, staff should, wherever possible, be of the appropriate gender and be careful to protect the dignity of the vulnerable adult. Wherever possible, two members of staff should be present when carrying out personal care.



## Prohibited Practices

- Allowing or engaging in any form of inappropriate touching.
- Using suggestive comments, even in fun.
- Allowing allegations made by an adult at risk to be unrecorded, not acted upon or not referred on, where appropriate.
- Administering medication unless trained and approved to do so. See Administration of Medications Policy and Procedure
- Providing a lift in your car for an adult at risk
- Visiting an adult at risk in their homes except in clearly agreed circumstances and unless approved by MD or Senior Management Team

Appendix 290617

Date: 29/06/17

Review: 29/06/18

Issued By: QAM & SG Lead

Reason for amendment to the safeguarding policy & procedure:


Due to onboarding of new prime contract with Learndirect. Contractual requirements to share SG concerns on their students & staff.

“As a learndirect Supplier, you must respond to every safeguarding incident, allegation or concern involving any learndirect learner to ensure their safety and welfare, take appropriate action and report the issue”

<https://portal.learndirect.co.uk/categories/beingaprovider/contract-1/safeguarding-3/>

Accessed 28/06/17 10:56am

- Antrec nominated safeguarding staff must report Prevent or safeguarding issues involving LD students to Learndirect by emailing Prevent-Safeguarding\_Reporting@learndirect.com to request the appropriate documents.
- You will be sent an email with 2 forms, both forms will be password protected.
- You will receive a further email with the details of the password to allow you to open and complete the documents.

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- Once completed return by email to: Prevent-Safeguarding\_Reporting@learndirect.com with the subject heading 'Supplier Prevent/Safeguarding Report'.
  - Report the number of Safeguarding issues that have arisen in-month on your Compliance Template.
  - Your LD Supply Chain Manager may periodically dip-check Antrec log.

**All safeguarding incidents must also be recorded in the Antrec SG Log & an Antrec SG form completed.**