

# SAFE GUARDING POLICY.

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## 1. PRINCIPLES:

The policy applies to all learners between the ages of 16-18, 19-23 and 24+ whose care and education comes within the remit of this organisation.

## 2. POLICY STATEMENT:

Kingdom College Limited fully recognises the responsibility it has regarding safeguarding and promoting the welfare of learners and is defined for the purposes of this guidance as:

- Protecting people from maltreatment.
- Preventing impairment of learners' health or development.
- Ensuring that learners are growing up in circumstances consistent with the provision of safe and effective care.
- Undertaking that role so as to enable those people to have optimum life chances and enter adulthood successfully;
- Promoting a safe environment free from violence.
- A young person is anyone under the age of eighteen.

### A vulnerable adult is:

Anyone aged 18 years and over who are dependent on family members, their social network, professionals or volunteers, as a result of a special need arising from the ageing process, physical or mental ill-health, learning disability or physical or sensory impairment. It is the level of dependency in respect of the meeting of basic needs that renders these adults particularly vulnerable. Vulnerable adults may be victims and/or abusers and they may themselves be in a caring role.

1. Section 175 of the Education Act 2002 states that governing bodies:
  - (a) must have arrangements for ensuring that the functions conferred on them in their capacity as a further education institution are exercised with a view to safeguarding and promoting the welfare of young people.
  - (b) shall have regard to any guidance given from time to time by the Secretary of State.
2. It is the responsibility of all members of staff to record and report concerns under this policy.
3. Kingdom College Limited endeavours to prevent all abusive situations, abuse can be described as:

**Physical Abuse:** This can include hitting, slapping, pushing, kicking, inappropriate restraint or sanction, misuse of medication or any other physical harm to vulnerable people.

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**Neglect:** Neglect is a persistent or severe failure to meet the vulnerable person's basic needs and may include ignoring medical and or physical care needs, failure to provide access to appropriate health, social care, and or educational services. Neglect will also include withholding medication adequate nutrition and heating.

**Sexual Abuse:** This includes rape, and sexual assault or the vulnerable person participating in or being coerced into participating in or watching sexual activity. It is not necessary for the vulnerable person to be aware that the activity is sexual and the apparent consent of the vulnerable person is irrelevant.

**Emotional Abuse:** Emotional abuse will include emotional abuse, threats of harm or abandonment, deprivation of contact, harassment, isolation and or withdrawal of services of supportive networks.

**Discriminatory Abuse:** Discriminatory abuse includes racist and sexual abuse that is based upon the individual's disability.

**Financial Abuse:** Financial abuse relates to the unauthorised and improper use of funds, money or resources belonging to the individual.

**Institutional Abuse:** Institutional abuse includes the practice of an abusive regime or culture which destroys the dignity and respect to which every person is entitled. It is the mistreatment of people brought about by poor or inadequate care or support, and poor practice that affects the whole setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

### 3. SCOPE:

This policy applies to all staff, and visitors working in company or with learners in placements with other agencies or employers. This policy covers observation of abuse, allegation, disclosure or suspicion of abuse or an expression of concern about abuse.

### 4. LEGISLATION:

The Safeguarding Policy affirms our commitment to the current and any subsequent enacted legislation governing safeguarding children and adults in particular:

- a) Human Rights Act 1998.
- b) Protection of Children Act 1999.
- c) Disability Discrimination Act 1995, 2005.
- d) Race Relations Act 1976.
- e) Race Relations (Amendment) Act 2000.
- f) Sex Discrimination Act 1975.
- g) Sex Discrimination (Gender Reassignment) Regulations 1999.
- h) Special Educational Needs & Disability Discrimination Act 2001.

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- i) Employment Equality (Sexual Orientation) Regulations 2003.
- j) Employment Equality (Religion & Belief) Regulations 2003.
- k) Sexual Offences Act 2003.
- l) Care Standards Act 2000.
- m) Health and Social Care Act 2008.
- n) Mental Capacity Act 2005.
- o) Domestic Violence Crime and Victims act 2004.
- p) Apprenticeships, Skills, Children and Learning Act 2009.
- q) Counter-Terrorism and Security Act 2015.
- r) Data Protection Act 2018 and the Human Rights Act 1998.

### 5. RESPONSIBILITIES:

1. All staff working in the Company are responsible for the operation of this policy.
2. The Designated Safeguarding Officers for the Company are Jacqueline Aiyela. In the absence of Jacqueline Aiyela, Faiz Amin Subhani shall be called upon to act as the Designated safeguarding Officer for the Company.
3. All members of staff have a duty to report any disclosure, allegation or suspicion of abuse, to the Designated Safeguarding Officer. This must be done immediately that the disclosure/allegation/suspicion is made/arises.
4. The Designated Safeguarding Officer has a duty to make a referral to external agencies whenever:
  - There is reason to suspect that a vulnerable adult is suffering or likely to suffer significant harm, or
  - An allegation, disclosure or suspicion of abuse or an expression of concern about abuse is made.
5. The Designated Safeguarding Officer is responsible for ensuring that any actions agreed at such meetings are progressed and followed up.
6. The consent of the abused person should be sought before a referral is made. However, there may be circumstances where there is a need to overrule their wishes. For example:
7. If the person is not able to make an informed choice or where this is uncertain.
8. If the vulnerable adult or others affected by the situation are in a life-threatening situation.
9. If the vulnerable adult or other people are otherwise at risk.
10. If a crime has been committed.
11. The Designated Safeguarding Officer will make every effort to attend any strategy or professionals' meetings to which the Company is invited, or may ask an appropriate colleague to attend on their behalf.
12. Any decision to overrule the wishes of the abused person should be recorded on the Referral Form, with the reasons for such a decision, and a copy should be kept in the Safeguarding File.

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13. In cases where the abused person wishes to self-refer to Social Services, the matter must still be referred to the Designated Safeguarding Officer, who should accordingly refer the matter to Social Services regardless of the individual's decision to self-refer.
14. The Designated Safeguarding Officer has a duty to seek advice from Ealing Council Social Services, if unsure as to whether a referral is appropriate.
15. The welfare of the person concerned, including the welfare of any other vulnerable adults or children who may be at risk, must always take precedence over confidentiality. Therefore, these procedures must be followed, irrespective of any request to maintain confidentiality.
16. All Designated Safeguarding Officers, including those who may in certain circumstances be required to perform this function, must be provided with appropriate staff development.
17. The Director will ensure the criminal background of applicants for vacant posts are checked via DBS.
18. All staff working in the company must have access to a copy of the Vulnerable Adult Protection Policy immediately upon starting work at the Company.
19. It is the responsibility of all staff and enrolled learners to adhere to safeguarding policy.
20. It is the responsibility of all staff to promote fundamental British values and comply with the Prevent Duty.
21. The Prevent Duty came into force on 1 July 2015 and defines extremism as “vocal or active opposition to fundamental British values. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

### What are British values?

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of different faiths and beliefs

### 6.1 WEB FILTERING:

KCL uses third-party, firewalls and security features to actively track and block access to extremist material, and to alert the Prevent Leads and Coordinators to students or staff who's browsing behaviour may indicate they are at risk of radicalisation.

## 7. ALLEGATIONS AGAINST STAFF:

1. Any individual who has a concern of a Vulnerable Adult Protection nature, relating to a member of staff, must report the matter at the earliest opportunity to the Director.
2. A Vulnerable Adult Protection concern will always exist, and therefore these Procedures must be followed whenever a member of staff is observed to subject or is accused of subjecting a Vulnerable Adult to any abusive behaviour.
3. If any individual is unhappy that their concerns are not being taken seriously within the Company, they should refer directly to Social Services.

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4. The Designated Safeguarding Officer will consult with Social Services to determine:
  - If there is a need to undertake preliminary enquiries and, if so, how the enquiries should be conducted or;
  - If there is sufficient information available to conduct an investigation under Vulnerable Adult Protection Procedures;
5. Whether immediate action to protect a Vulnerable Adult is required.
6. Preliminary enquiries should be made by the Directors, after consultation with Social Services.
7. The enquiries should be minimal to establish the facts of the allegation if these were not established or were unclear at the time the original concern was raised, i.e. date, time, place of any alleged incident, any witnesses and other relevant factors.
8. In depth questioning of vulnerable adults or professionals/professional carers should not take place.
9. Careful records should be made regarding any concerns or allegations and actions taken in response to these.
10. Further consultation with Social Services, should then take place to establish the most appropriate next step.
11. When an allegation is made a number of inter-related elements will exist (Vulnerable Adult Protection, Criminal Investigation, Disciplinary, complaints).
12. Social Services will therefore have the key role in co-ordinating the relevant elements and ensuring that all subsequent stages of the Vulnerable Adult Protection Procedures are followed.

The Senior Managers are responsible for this policy.

## 8. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH VULNERABLE LEARNERS:

1. Kingdom College Limited will operate safe recruitment practices including ensuring enhanced DBS/CRB, ISA Registration and reference checks are undertaken, prior to employment.
2. Kingdom College Limited will identify at the recruitment stage the level of DBS disclosure for each of its posts. An acceptable DBS will be a condition of employment and staff will be required to register with the ISA in accordance with the timescales.
3. Kingdom College Limited will contact the appropriate authorities in the event of an allegation being made against a member of staff and adhere to the Safeguarding Multi-Agency Procedural Framework.
4. Kingdom College Limited will ensure that any disciplinary proceedings against staff relating to Safeguarding matters are concluded in full even when the member of staff is no longer employed at Kingdom College Limited and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

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5. Kingdom College Limited will ensure that all staff, volunteers and agency workers are aware of the need for maintaining appropriate and professional boundaries in their relationships with vulnerable learners, parents, guardians and carers.
6. Kingdom College Limited will ensure that all staff, volunteers and agency workers are aware that any sexual relationships with vulnerable learners are improper and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).
7. Kingdom College Limited will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with young people, parents and guardians.
8. Kingdom College Limited will follow guidance in 'Safeguarding Children and Safer Recruitment in Education' when dealing with allegations against staff.
9. All staff and volunteers are aware that disclosure will be made to third parties where required and that they will be required to cooperate with any subsequent enquiry or investigation.

### 9. MONITORING & EVALUATION:

The designated safeguarding lead will on an annual basis monitor and evaluate all issues relating to Safeguarding. An annual report will be presented to the Director on Safeguarding issues.

#### Designated Contacts:

As published annually.

### 10. Related Policies

- Anti-Bullying Policy
- Race Equality Policy
- Equality and Diversity Policy
- Harassment Policy
- Staff Disciplinary Procedure
- Staff Recruitment Policy
- Staff Development Policy
- Health and Safety Policy
- Complaints Policy

### 11. SAFEGUARDING LEARNERS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, OR TRAFFICKING:

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1. Our safeguarding policy above through the organisation's values, ethos and behaviour policies provides the basic platform to ensure young people and vulnerable adults are given the support to respect themselves and others, stand up for themselves and protect each other.
2. Kingdom College Limited keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.
3. Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum
4. Kingdom College Limited works with and engages our families and communities to talk about such issue.
5. Our staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
6. Our Designated Safeguarding Lead knows where to seek and get advice as necessary.
7. Kingdom College Limited brings in experts and uses specialist material to support the work we do.

## 12. PROCEDURES

Procedures to follow if a Vulnerable Adult makes a disclosure to you that may relate to abuse or possible abuse.

If a Vulnerable Adult makes an allegation of abuse to you:

### You should:

- Listen. Do not interrupt.
- You MUST NOT promise the Vulnerable adult that you will keep the matter confidential. Explain to him/her that you have to report the matter to the Designated Safeguarding Officer, as this is your legal duty.
- Once the individual has finished speaking, it may be necessary to ask questions.
- Only ask questions if you are still unsure whether this is a Vulnerable Adult Protection issue. You are not conducting an investigation; you are simply establishing the key facts.
- Only ask simple, open, non-leading questions. E.g. if a vulnerable adult tells you they have been hurt, ask "How did you get hurt?" rather than "Did someone hit you?"
- Once you know you are concerned enough to raise the matter with the Safeguarding Officer, don't ask any more questions.
- Write down a report in a safeguarding incident record (that can be found appendix 1) what has been said immediately afterwards in words used by the Vulnerable Adult and yourself to the best of your memory.

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- Note anything about the Vulnerable Adult which is connected i.e. any visible injuries including the position and description, the demeanour of the Vulnerable Adult i.e. crying, withdrawn. These should also be recorded immediately afterwards.
- The matter should be immediately reported to a Designated Safeguarding Officer, and all records taken should be handed over at this time.
- If in doubt seek advice from a Designated Safeguarding Officer.
- The Designated Safeguarding Officer will make a judgement as to whether a referral to Social Services is appropriate. If there is doubt, then advice must be sought from Social Services or LADO.

### 13. CONTACTS:

Name	Role	Contact Number	Email Address
KC Safeguarding team		02036496324	<a href="mailto:safeguarding@kingdomcollege.org.uk">safeguarding@kingdomcollege.org.uk</a>
Dr Faiz Subhani	Designated Safeguarding Lead	+44 7848 858005	<a href="mailto:faiz.subhani@kingdomcollege.org.uk">faiz.subhani@kingdomcollege.org.uk</a>
Mumtaz Khan	Deputy Designated Safeguarding Lead	+44 7454 165021	<a href="mailto:mum.khan@kingdomcollege.org.uk">mum.khan@kingdomcollege.org.uk</a>
Jacqueline Aiyela	Deputy Designated Safeguarding Lead	+44 7749 857173	<a href="mailto:Jacqueline.aiyela@kingdomcollege.org.uk">Jacqueline.aiyela@kingdomcollege.org.uk</a>

Last Reviewed date: 01-07-2022

Next Review Date: 01-06-2023

*Mumtaz Khan*

Mumtaz Khan, Managing Director

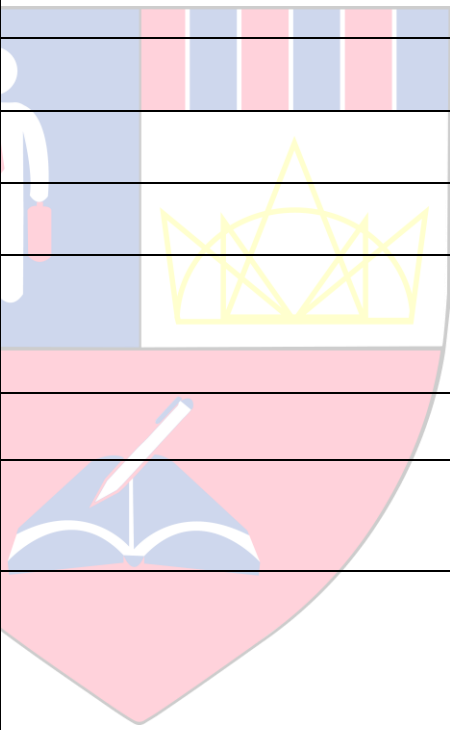


## 14. APPENDIX 1

### Safeguarding ~ Incident Report

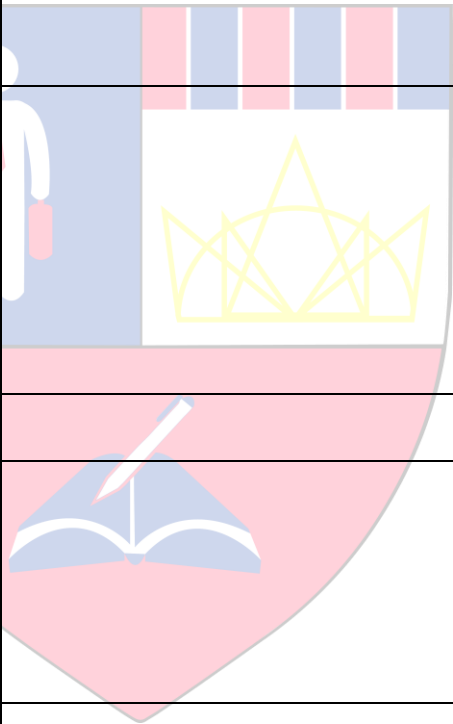
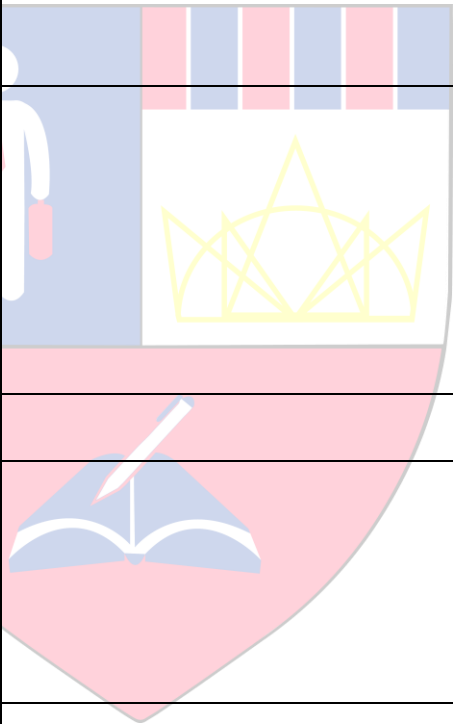
Please use this [link](#) to report safeguarding Concerns.

Please use the following form to record and report an incident or disclosure. Please send it to Safeguarding Lead, see contacts above

Safeguarding Incident Recording form	
<b>Your Details:</b>	
• Name:	
• Job Role	
• Date	
• Contact Details (Phone and e-mail)	
<b>Details of Incident / disclosure</b>	
• Date of initial raising of concern / incident	
• Who raised the concern? ○ Name ○ Contact details	
• Who is the vulnerable person / child? ○ Name ○ Age (if applicable in the case of Under 18) ○ Contact details	

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<ul style="list-style-type: none"> <li>○ Parents contact details</li> </ul>	
<ul style="list-style-type: none"> <li>● Where did the incident occur?</li> </ul>	
<ul style="list-style-type: none"> <li>● When did the incident occur?             <ul style="list-style-type: none"> <li>○ Date and time</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>● What happened?</li> </ul>	
<ul style="list-style-type: none"> <li>● Were there witnesses?             <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Age (if applicable in the case of Under 18s)</li> <li>○ Contact details</li> </ul> </li> </ul>	
<p><b>After the incident/ disclosure</b></p>	
<ul style="list-style-type: none"> <li>● Were there any witnesses to the referral?             <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Contact details</li> </ul> </li> </ul>	
<ul style="list-style-type: none"> <li>● Who have you discussed this incident with?             <ul style="list-style-type: none"> <li>○ Name</li> <li>○ Contact details</li> </ul> </li> </ul>	