

## **SAFEGUARDING POLICY AND PROCEDURE**

### 1. Aims

The principle of safeguarding is the same for both young people and vulnerable adults: - that everyone has a duty to protect young people and vulnerable adults from harm. We all have a role in enabling young people and adults to live a life free from abuse or neglect. This cannot be achieved by any single agency. Every organisation and person who comes into contact with a young person or adult has a responsibility and a role to play to help keep them safe.

- This policy applies to all staff and contractors who work within CIH Housing Academy
- CIH Housing Academy is committed to the safeguarding of its learners, delegates, and apprentices (known hereafter as individuals), both over and under the age of 18, as well as its staff members and contractors
- To ensure individuals are protected, CIH Housing Academy has up to date safeguarding policies, procedures, and processes which all individuals, relevant staff members and contractors will have access to; these will be supplemented by briefings as appropriate

CIH Housing Academy is committed to ensuring that:

- a safe environment is provided for all
- any individual or member of staff or contractor who is suffering, or likely to suffer, significant harm, is identified, and
- appropriate action is taken to see that they are kept safe, both at home and at their place of employment
- an environment is promoted in which everyone feels valued and able to communicate their wishes and feelings successfully

### **2. Safeguarding commitment**

- All people, regardless of age, disability, gender, racial heritage, religious belief and sexual orientation or identity have the right to protection from harassment, harm, or abuse

- All members of CIH Housing Academy, including individuals, staff, and contractors, are responsible for safeguarding and promoting the welfare of others and will be briefed and receive training as appropriate, on CIH Housing Academy's Safeguarding Policy and Procedures. Safeguarding is everyone's responsibility
- Responsibility for the protection of young people, and vulnerable adults must be shared because people are safeguarded only when all individuals and relevant agencies accept responsibility and co-operate with one another
- The learning environment will be one in which all people feel valued and respected, and are encouraged and supported to raise any concerns they have about their own safety and welfare
- Disclosures about abuse or neglect and allegations against persons in a position of trust made by individuals and employees alike will always be taken seriously and reported in line with Housing Academy procedures and with due regard to the privacy of the individuals and their families
- Abuse of trust. All staff and contractors should clearly understand the need to maintain appropriate boundaries in their dealings with individuals. Intimate relationships between staff or contractors and individuals will be regarded as a grave breach of trust
- Safeguarding Procedures provide a clear framework for raising concerns or worries about a young person or vulnerable adult and should be read and understood by all CIH Housing Academy staff
- Forced marriages. This policy includes young people who are being forced to marry, or those who fear they may be forced to marry. A separate policy exists for Prevent (radicalisation).

### **3. Culture of Safety**

CIH Housing Academy is committed to building a 'culture of safety' in which individuals are protected from abuse and harm in all areas of our service delivery. We are committed to a co-ordinated approach where safety is everyone's responsibility.

We abide by statutory duties as set out by Ofsted and government legislation in respect of references and DBS checks for staff and contractors,

to ensure that no disqualified person or unsuitable person works in a setting with or has access to young people and vulnerable adults.

Existing and potential staff, and contractors, who will be in contact with young people and vulnerable adults, will be informed of the need to carry out disclosure checks with the Disclosure and Barring Service (DBS) before posts can be confirmed. The accompanying procedures set out how these will be undertaken. We will also take steps to ensure that we have control over whom comes into the Housing Academy setting or who has access to our virtual learning environment so that no unauthorised person, including visitors, has unsupervised access (physical and electronically) to any young people or vulnerable adults.

#### **4. Roles and Responsibilities**

All adults working with individuals have a responsibility to safeguard and promote their welfare. It is far better to report a potential issue or concern and for it to be unfounded than not to report something that could potentially lead to the death of a child or vulnerable adult.

##### **Managers**

CIH Housing Academy has appointed its managers as Designated Safeguarding Leads (DSL). The names of designated staff members and their deputies can be found in Appendix 1.

Managers must take responsibility for any concerns that come to their attention in their teams. They must never ignore, underplay, or pass on overall responsibility to another member of staff, contractor, or peer. Managers have a key role in helping develop understanding, knowledge, and confidence to ensure procedures are followed effectively, professionally, and safely. No member of staff or contractor raising a concern or indeed, any manager must shoulder this burden on their own.

##### **Staff and contractors**

All staff and contractors will be briefed in and informed of their responsibilities in being alert to the signs of abuse. CIH Housing Academy will support staff and contractors by providing an opportunity to talk through their concerns with the Designated Safeguarding Lead (DSL) or their deputy.

Staff and contractors will be provided with relevant information, on a need to know basis, about individual young people and vulnerable adults to keep

them vigilant to any specific needs. They must share any concerns with the designated members of staff for safeguarding. If they feel there is a real and immediate health risk to an individual, then anyone can refer directly to the relevant local authority social services team or the police.

### **Individuals**

CIH's Housing Academy's Safeguarding Policy and Procedures will be communicated to apprentices, delegates, and learners as part of their induction programme or pre-course briefing. It will be uploaded onto the CIH website and online platforms for individuals, contractors, and visitors to the website to see.

### **Whistle Blowing**

CIH's Housing Academy Whistle Blowing policy and procedure is uploaded onto the CIH website and sets out the way contractors, individuals and staff may raise any concerns they have, including safeguarding, and details how those concerns will be dealt with.

## **5. Propriety and Behaviour**

The Children Act 2004, through the Stay Safe outcome of the Every Child Matters Agenda, places a duty upon organisations to promote the wellbeing of young people. This includes the need to ensure that all adults who work with or on behalf of young people in these organisations are competent, confident, and safe to do so.

All adults have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of young people and vulnerable adults, with whom they work or come into contact with. It is therefore expected that they will adopt high standards of personal conduct in order to maintain the confidence and respect of the general public and of their colleagues. Please refer to the CIH Codes of conduct and ethics for further information.

Adults who work with young people and vulnerable adults are responsible for their own actions and behaviours and should avoid any contact, which could lead to someone questioning their motives and intentions or allegations being made

It is acknowledged that people may have concerns about the possibility of an allegation being made against them and for that reason it is important

that they familiarise themselves with behaviours that may be considered as constituting misconduct or gross misconduct, and those which would be considered illegal. Further information can be found in the CIH Codes of conduct and ethics.

Circumstances where misunderstandings may arise:

- Dress and appearance
- Gifts, rewards and favouritism
- Communication with learners (including the use of technology and /or social media platforms)
- Social contact
- Sexual contact
- Young people and vulnerable adults in distress

## **5. Powers and positions of trust**

All CIH Housing Academy staff and contractors are considered to be in a position of trust regarding apprentices, delegates and learners, because of their knowledge, position and/or the authority invested in their role. This means that staff and contractors should not use their:

- position to gain access to information for their own or other's advantage.
- position to intimidate, bully, humiliate, threaten, coerce or undermine anyone
- status and standing to form or promote relationships which are of a sexual nature or may become so

This means that staff and contractors should:

- ensure that an unequal balance of power is not used for personal advantage or gratification
- maintain appropriate professional boundaries and avoid behaviour which may be misinterpreted by others
- report or record any incident where their behaviour may be misinterpreted with a senior member of staff at the earliest opportunity

CIH Housing Academy advises all staff and contractors to avoid the use of social media platforms as a communication format with apprentices, learners, delegates, and learners. We require all of our apprentices, delegates, learners, staff and contractors to use the messaging facility provided by our online platforms, or email for any matter relating to CIH Housing Academy [housingacademy@cih.org](mailto:housingacademy@cih.org) . Failure to comply with this policy will result in the matter being escalated to senior management within CIH Housing Academy.

## **7. Physical Contact and Physical Intervention**

Not all young people and vulnerable adults feel comfortable about physical contact. Adults should not assume that it is acceptable practice to use touch as a means of communication. Wherever possible, young people and vulnerable adults should be advised before physical contact or intervention is made.

It is recognised that some young people / vulnerable adults who have experienced abuse may seek inappropriate physical contact and adults should be particularly aware of this when it is known that an apprentice, delegate, or learner has suffered abuse.

In this circumstance careful consideration should be given to the needs of the individual. Details of the individual and his / her additional needs must be reported to the DSL as detailed in the procedures.

## **8. Preventative Work**

As part of developing a healthy, safer lifestyle, apprentices, delegates and learners will be encouraged to consider:

- How to recognise and manage risks in different situations and then decide how to behave appropriately (including those within the digital world)
- How to judge what kind of physical contact is acceptable and unacceptable
- How to recognise when pressure from others (including people they know) threatens their personal safety and develop effective ways of resisting pressure, including knowing where and when to get help

Our apprentices, delegates and learners should feel valued, respected, and able to discuss any concerns they have. CIH Housing Academy will seek to create an environment where this can be achieved. Staff and contractors will have a responsibility to discuss potential safeguarding issues with their apprentices, delegates and learners and must escalate any potential issues to the DSL immediately thereafter.

## **PART 2: SAFEGUARDING PROCEDURES**

### **Summary**

All apprentices, delegates and learners (known collectively as 'individuals') registered with CIH Housing Academy must be able to access the safeguarding policy.

All members of CIH Housing Academy, including staff, and contractors, are responsible for safeguarding and promoting the welfare of others and must undertake to:

- Participate in any briefings and training provided
- Read the relevant documentation
- Follow published procedures

### **1 Training and information giving**

#### **1.2 Staff members and contractors**

To ensure individuals are protected all appropriate staff members and contractors are required to read and participate in briefings on CIH Housing Academy's safeguarding policies and procedures.

Staff member and contractors will

- engage in briefings as part of their induction and other activities with CIH Housing Academy, for example, engagement with webinars, attending conferences
- have access to relevant policies and procedures via Moodle
- be required to keep up date with these as part of their on-going CPD



All staff and contractors who will have contact with young people and vulnerable adults will receive periodic safeguarding briefings and will be required to confirm through the annual declaration form that they have

- updated their knowledge, for example, government briefings and other relevant documentation
- participated in briefings, for example, attended webinars and other relevant activities

as part of their CPD. This will also be picked up as part of annual appraisals.

This information will be entered into a register held by CIH Housing Academy.

### **1.3 Individuals**

Apprentices, delegates, and learners will be advised of CIH Housing Academy's Safeguarding Policy and Procedures as part of their induction programme or pre-course briefing. A copy of the document can be found on CIH Housing Academy's website.

## **2 Culture of safety**

### **2.1 Disclosure and Barring Service (DBS) checks**

All existing and potential staff members and contractors will be required to have disclosure checks. These will be undertaken on an incremental basis with those contractors who have direct contact with individuals being carried out first, followed by staff and any remaining contractors.

Where applications are rejected because of information that has been disclosed, applicants will be advised and given the opportunity to challenge incorrect information.

## **2.2 Access**

To prevent any unauthorised person gaining unsupervised access to any young person or vulnerable adult the following checks are in place:

- **Physical access** - all learning will take place in approved settings, such as CIH offices and organisation settings where health and safety checks will be undertaken.
- **Electronic access** - this is covered by our E-learning systems security policy which is attached at Appendix 2

## **3 Reporting procedures**

Members of staff or contractors with a safeguarding concern for any other person should report it to the CIH Housing Academy's Designated Safeguarding Lead or their deputy (contact details of the DSL are attached in Appendix 1) and complete a Safeguarding Report form (Appendix 6).

Where an individual has disclosed that they have suffered abuse the procedures outlined in Appendix 3 must be followed. Where it is believed that a person is in need, is suffering from, or is at risk of significant harm the procedures detailed in Appendix 4 must be followed.

Any criminal offences should be reported immediately to the Police.

Referrals to relevant external agencies such as police and social services teams, should be made by the person who the abuse has been reported to whilst carrying out their job role, supported by their DSL line manager, normally within 24 hours of an incident being reported. The Education Safeguarding or the Local Vulnerable Adults Safeguarding Board procedures for the individual's local authority area can be obtained by an internet search.

All safeguarding concerns should be recorded by staff on a secure database or log of observations, which will include as a minimum, name and address of the person at risk, name of the reporter, name of the manager or designated person, what the concern was, what actions were taken and the reasons for the decision.

CIH Housing Academy recognises that it does not have the responsibility or authority to investigate cases of suspected abuse. However, it will co-operate with and share information with relevant external agencies in any enquiries regarding safeguarding matters, including representation at case conferences, core groups and multi-agency planning meetings as required.

#### **4 Disclosure of information**

All safeguarding records are subject to Freedom of Information Act, 2000 and the Data Protection legislation. If there is any doubt as to the rights of any party to access information, we may seek legal advice prior to releasing any information.

Confidential information will only be passed to external organisations with the individual's consent except in the case of exceptional circumstances as detailed in the Data Protection Acts, 1998, and 2018. These circumstances would include:

- Where there is clear evidence of fraud
- To comply with the law
- In connection with legal proceedings
- To protect the health and safety of the individual, where the health and safety of the individual would be at risk if the information were not disclosed, or there is a legal requirement to do so.

Information will be shared with other agencies in accordance with statutory procedures. If the young person or adult is deemed to be at risk or any other person is deemed to be at risk, referrals can still be made despite not having the consent of the person involved. Where an adult has capacity, they can refuse consent to; sharing information with non-professionals, a medical examination and to make a complaint to the police. Each decision whether or not to share and/or breach a person's right to confidentiality will be made by balancing the risk to the individual and other and the right to confidentiality of the individual (Article 8 Human Rights Act, 1998 / Mental Capacity Act, 2005).

Assurances of absolute confidentiality should not be given in reports of abuse. All staff and contractors will make it clear to any young person or vulnerable adult disclosing information that they cannot guarantee confidentiality, but they will only pass the information on to the people that can help them.

The Data Protection Acts, 1998 and 2018, should not be barriers to sharing information that needs to be shared (on a need to know basis). Information concerning young people and vulnerable adults at risk will be shared with relevant members of staff on a "need to know" basis. A designated member of staff for safeguarding will make a judgement on each individual case about who needs and has a right to access particular information.

## **5 Allegations against staff and adults in a position of trust**

All staff and contractors should be aware of their duty to raise concerns about the attitude or actions of colleagues or individuals. Please note guidelines set out within the CIH disciplinary and grievance procedures (for staff) and the CIH HA's complaints policy and procedures (for contractors) will be adhered to for internal investigation purposes.

Where an allegation has been made against a member of staff or contractor which calls into question their ability to safeguard and promote the welfare of young people and vulnerable adults, and their suitability to work with these individuals which is likely to result in a breakdown of public confidence, these will be investigated.

If a person makes an allegation against a member of staff, contractor or another individual at CIH Housing Academy, the DSL must be informed immediately, and a safeguarding report completed.

If an allegation of abuse is made against a member of staff in a work-based provision not directly linked to CIH Housing Academy, the DSL or their deputy must be informed and it must be reported to the Police and the DSL in the work based provision. The member of staff concerned should have no further contact with the individual concerned and must not be informed of the allegation prior to referral.

Any person (including contractors, staff and those in work-based placements/apprenticeships) who come into contact with young people and vulnerable adults have a legal and moral duty to safeguard and promote their welfare. This duty requires individual staff and contractors to ensure the safety of a young person or vulnerable adult involved in any activity or interaction for which that person is responsible.

## **6 Conducting an investigation**

On receipt of a concern/allegation about a member of staff or contractor the DSL, in conjunction with CIH Housing Academy senior management will follow this process (Appendix 4):

- Determine whether it is a matter that can be properly dealt with under CIH Housing Academy's procedures or whether the Police and/or other agencies might need to be involved. Where the view is taken that the Police and/or other agencies should be involved, a strategic discussion will take place in accordance with CIH Housing Academy's Safeguarding Procedures within 3 working days of referral or immediately depending upon the circumstances of the situation
- Determine how and by whom the adult against whom the allegation has been made is informed about the nature of the allegation and what will happen next. Ideally this should happen as soon as possible, except where the decision has been taken to involve the Police and/or other agencies, in which case this should not happen before the strategy discussion/meeting has taken place
- The DSL will advise the individual subject to the allegation to seek independent advice, support, and representation at the earliest opportunity, for example from a Union, where the individual is a member, or from a legal representative
- Where it is concluded that there should be further enquiries by Police and/or other agencies, the member of staff or contractor should be suspended, and it should be determined whether there are any constraints and limitations on the information that the member of staff can be given about the allegation.

Whilst enquiries are being made every effort will be made to maintain confidentiality and to guard against publicity.

If the outcome of the internal investigations is that the threshold of significant harm has been reached, then an external meeting with the relevant organisations will be convened.

## **7 Suspension of a staff member or contractor whilst enquiries are taking place**

Suspension is a neutral act taken by an employer or commissioning organisation, to provide a safe environment for the individual adult against whom the allegation has been made, apprentices, delegates and learners, staff and other contractors, whilst enquiries are undertaken.

Suspension can only be carried out by the Head of Professional Standards.

Every person involved will be kept advised at each stage of the enquiries and every effort will be made to ensure that the process is open and transparent, whilst maintaining confidentiality.

Once the enquiries have concluded every person involved will be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes.

## **8 What happens once the enquiries have been concluded**

Where the allegations have **not been substantiated** the employee or contractor will be reinstated to their duties.

Where the allegations have **been substantiated** then the Head of Professional Standards will consider whether a referral should be made in respect of the employee or contractor to the appropriate profession's governing body (CIH, Institute for Learning, etc) and/or to the Disclosure and Barring Service, who will consider whether the individual should be "barred" from working with young people and vulnerable adults.

Irrespective of whether allegations have or have not been substantiated, a clear and comprehensive summary of the allegation, the enquiries undertaken, and a clear account of decisions taken and reasons for them will be held securely upon the employee's or contractor's confidential personnel file. The record will be held at least until the person has finished working for CIH and/or CIH Housing Academy or for a period of ten years after the allegation was made if this is longer. The responsibility for making sure that this happens is with the DSL.

## **Appendices**

- 1. Safeguarding Leads/ Deputies**
- 2. E- Learning systems security policy and procedures**
- 3. Flowchart - Actions to take when abuse is disclosed**
- 4. Flowchart - Actions to take when abuse is suspected**
- 5. Relevant publications**
- 6. Safeguarding incident/referral form**

## **Appendix 1: Safeguarding Leads/ Officers**

### **Learning and Development**

Designated Safeguarding Lead, Learning & Development: Manager Kirsty Cooper  
Tel: 024 76851736

Deputy Designated Safeguarding Lead, Learning & Development: Steven  
Batchelder  
Tel: 024 76851720

### **Training and Apprenticeships**

Designated Safeguarding Lead, Training and Apprenticeship Manager: Denise  
Taylor- Trotman  
Tel: 020 7520 3384

Deputy Designated Safeguarding Lead, Training and Apprenticeships: Jonathon  
Tennant  
Tel: 020 76851789

### **Operations**

Designated Safeguarding Lead, Academy Operations Manager: Sharon Hackett  
Tel: 024 76851749

Deputy Designated Safeguarding Lead: Stacey O'Neill  
Tel: 024 7685 1714

Or email [housing.academy@cih.org](mailto:housing.academy@cih.org)



## **Appendix 2: E-Learning systems security policy and procedures**

### **General**

- Users are only given the minimum level of access to allow them to do their job, and only for the minimum length of time required to complete their work
- The minimum amount of information is held on the individual that will enable them to use the sites. Their name and email address is the only personal information that is stored, unless added by the individual themselves in relation to their studies.

### **Ecordia**

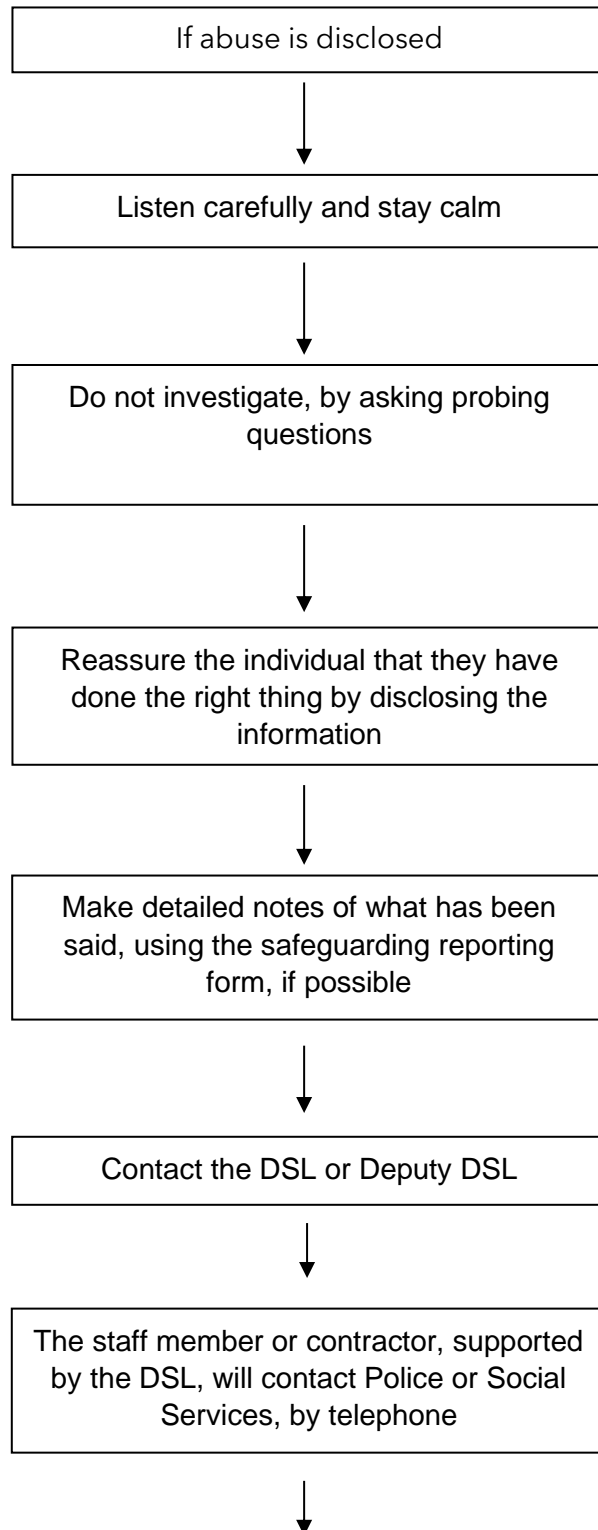
- Apprentices can access their portfolio only
- Associates can only access their candidates' portfolios
- Only the Digital Manager and apprenticeships officers and administrators have 'QAC' level access which allows them to perform all functions on the site
- 19 different roles are available to ensure that each user only gains access to the data they need, for example, for internal verification and external assessment
- Data backed up every hour
- 128-bit encrypted security and authentication.

### **Moodle**

- Only the Digital Manager and Moodle administrator have 'administrator' level access which allows them to perform all functions on the sites. This helps to protect the integrity of the sites and mitigates the possibility of damage or loss of data
- Any roles for users who are not learners or tutors are applied by the Digital Manager or Moodle administrator only, and requests for these are assessed on a case by case basis to ensure they are essential to the development and delivery of courses
- Backups of every site are made nightly

- Moodle passwords are required to be of a minimum length and contain a mix of upper/lower case/ numerical characters to increase security
- Moodle roles limit learners and tutors' activity to the courses they've been assigned to, and they can only interact with others following the same course. Accounts are suspended 6 months after the end of their course
- Learner Email addresses are hidden from other learners on the sites, so unless they actively send their address to someone else they can only communicate using the built-in messaging systems which log all communication. Tutors have the email addresses of their learners and vice-versa
- All users can block other users from messaging them using the Moodle messaging system.

### Appendix 3: Flow chart of actions to be taken when abuse is disclosed



The DSL will follow up the telephone referral with a written referral within 24 hours

#### **Appendix 4: Actions to take when abuse is suspected**

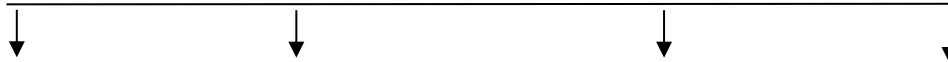
There are concerns about the welfare of a young person or vulnerable person and abuse is suspected



Raise concerns with DSL or Deputy and complete a safeguarding reporting form



The DSL will log these concerns and will assess the situation to determine the next course of action, which could be:



Contact Social Services or

Meet with the individual to collect more information and identify support needs

Individual will be monitored

Next of kin may be contacted (if it is clear that the individual would not be put in danger by doing this) or DSL in employer organisation

## **Appendix 5: Relevant Publications**

- Keeping Children Safe in Education, 2018
- Working Together to Safeguard Children, July 2018
- The Data Protection Act 2018
- The Children Act 1989
- Safer Working Practice for Adults who Work with Children and Young People, 2015
- Safeguarding Children and Safer Recruitment in Education, 2010
- Information Sharing Guidance for Practitioners, 2015
- Safeguarding Children, Young People and Vulnerable Adults policy 2015
- Ofsted's Further Education and Skills Inspection handbook April 2018
- The Care Act 2014 and further statutory guidance
  - <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>
  - Changes made in October 2018:
    - <https://www.gov.uk/government/publications/care-act-statutory-guidance/list-of-changes-made-to-the-care-act-guidance>

## Appendix 6: Safeguarding Incident/Referral Form

SAFEGUARDING INCIDENT REPORT  
FORM

To be completed and sent to Designated Safeguarding Lead.

### Apprentice, delegate or learner details:

Name

DOB

Age

Course or programme

Associate, trainer or tutor details

### Incident/Concern Details:

Date of Incident/Disclosure

Time

Member of staff disclosed to

Details (continue over page)

I.e. who, where, who involved

Outcome

Other relevant staff involved (including agencies such as social services, police etc)

Signature : \_\_\_\_\_ Print Name : \_\_\_\_\_

Position : \_\_\_\_\_

**Related policies and procedures:**

- Prevent policy and procedure
- Learning, teaching and assessment strategy
- Data Protection Act 2018 guidelines
- Whistle blowing policy and procedure