

College Policies and Procedures

**Child Protection and
Vulnerable Adults Policy**

SUE COOLE

**Vice Principal Learner Support & Community Links
December 2010 (revised Sep 2011)**

Child Protection and Vulnerable Adults Policy

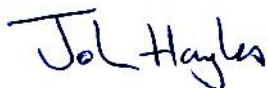
Policies and Procedures made by the Principal and Chief Executive under Delegated Authority from the Corporation

These policies and procedures are made by the Principal and Chief Executive of the College using the powers delegated by the Corporation in accordance with the Instrument and Articles of Government.

They are intended to ensure that the matters concerned are not only conducted fairly, appropriately and in accordance with the law where required, but also promote the purposes of the College and its customers.

The policies and procedures may be revised or amended from time to time in the light of experience or changing circumstances.

If you have any observations on these policies and procedures, please write to the Principal and Chief Executive.



.....
John Hayles
Acting Principal and Chief Executive

30 September 2011
Date

**This Policy is available in other languages and formats upon request
by telephoning the College on 0845 52 12345.**

Equality Impact Assessment

Date of Equality Impact Assessment	19 th August 2010
Name of policy, practice, process or procedure	Child Protection & Vulnerable Adults Policy
What is the main aim or purpose of the policy, practice, process or procedure?	To ensure that all learners are safeguarded whilst enrolled at the College
Who is responsible for creating/implementing this? Please state job role	Sue Coole Vice Principal Learner Support & Community Links
Names of staff, students, stakeholders involved in the equality impact assessment process	Sue Coole, Sandy Connors, Sharon Cousins

Information to support the impact assessment process

What evidence is already available to help inform the impact assessment process and to promote the general and specific duties related to equality and diversity? (Consider both quantitative and qualitative information)	<ul style="list-style-type: none"> • Complaints re Bullying & Harassment • CP/VA referrals to Social Services and actions taken • CP/VA referral/report • Allegations against staff and outcomes • LSCB meetings
In what areas are there concerns that the policy, practice, process or procedure could have a differential impact? (Please circle or highlight)	<p>Age</p> <p>Disability</p> <p>Race</p> <p>Religion or Belief</p> <p>Sex (Gender)</p> <p>Sexual Orientation</p> <p>Gender Reassignment</p> <p>Marriage & Civil Partnership</p> <p>Pregnancy & Maternity</p> <p>Social Class/Background</p>
What are the risks associated with the policy, practice, process or procedure in relation to the differential impact?	Access to the information due to disability/language ability
What are the expected benefits of the policy, practice, process or procedure?	To ensure that all learners are effectively protected and all staff know and understand processes required

Equality Action Plan

Please list any recommendations for action that are planned as a result of this impact assessment

(Categories: Age, Disability, Race, Religion or Belief, Sex (Gender), Sexual Orientation, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity, Social Class/Background, Other)

Identify groups	Action required/changes and modifications to outline of the promotional benefits	By Whom	By When	Evaluation and Date
Disability Race Social class/ background	Statement on the policy related to request for documents in different fonts/mediums etc.	Sue Coole	19/08/10	Evaluation with Designated Child Protection Officers and Head of Service

If the action proposed will not fully eliminate negative impact, why is this and how can it be justified?	Action will fully eliminate negative impact
General comments/concerns	

- This document has been impact assessed against the Communication Guidelines and Equality Impact Assessment process

EXECUTIVE SUMMARY

Child Protection & Vulnerable Adults Policy

South Essex College has a statutory and moral duty to ensure that the College functions with a view to protecting and promoting the welfare of children, young people and vulnerable adults receiving education and training at the College or who are visiting the College.

Policy Statement

The College is committed to ensuring that it:

- provides a safe environment for all learners
- identifies children, young people and vulnerable adults who are suffering or are likely to suffer significant harm
- takes appropriate action to see that such children, young people and vulnerable adults are kept safe, at home, at the College, and at all other activities relating to educational placement
- has safe recruitment and selection procedures in place when recruiting staff

South Essex College will annually review the Child Protection and Vulnerable Adults Policy to comply with legislation and guidance from the Local Safeguarding Children Boards (Southend, Essex and Thurrock) and will provide regular training for all staff working with children, young people and vulnerable adults.

A senior member of the College management team (Vice Principal Learner Support and Community Links) has special responsibility for child protection/safeguarding vulnerable adults and has a duty to:

- provide an annual report to the College Corporation which reviews how these duties have been discharged
- provide a report each quarter to the Local Safeguarding Children Boards (Southend, Essex and Thurrock) regarding referrals to the Department of Social Care
- provide a report each quarter to the Local Safeguarding Children Boards regarding allegations of abuse against members of staff
- Work in partnership with the Local Authority Designated Child Protection Lead regarding allegations against members of staff and for general guidance regarding child protection and safeguarding

Child Protection and Vulnerable Adults Policy

Dealing with Suspicions or Allegations of Child Abuse or Abuse of Vulnerable Adults

General Policy Statement

South Essex College has a statutory and moral duty to ensure that the College functions with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training at the College or who are visiting the College. The College accepts that safeguarding is a shared responsibility and has, in line with guidance such as Working Together, a strong commitment to co-operate in a multi agency arena and to actively promote and safeguard the welfare of young people.

Throughout these policies and procedures reference is made to 'children and young people'. This term is used to mean 'those under 18 years of age' (The Children Act 2004).

The College Corporation and Executive recognise that some adults are also vulnerable to abuse, accordingly the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. The term 'vulnerable adult' refers to any person aged 18 years and over who is or may be in need of support and community care services by reason of mental impairment, disability or illness and who is or may be unable to fully take care of him/herself or unable to protect him/herself against significant harm or exploitation.

The College Corporation is committed to ensuring that the College:-

- provides a safe environment for all learners.
- identifies children, young people and vulnerable adults who are suffering or likely to suffer significant harm
- takes appropriate action to see that such children, young people and vulnerable adults are kept safe, at home, at the College, and at all other activities relating to educational placement.

In pursuit of these aims the College will approve and annually review policies and procedures with the aim of:-

- raising awareness of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of a safe environment for all those within the College
- aiding the identification of children, young people and vulnerable adults at risk of significant harm, and providing procedures for reporting concerns.
- establishing the procedures for reporting and dealing with allegations of abuse, including those against members of staff
- the safe recruitment of staff

In developing the policies and procedures the College will consult with, and take account of, guidance issued by the Department of Education and other relevant bodies and groups. The procedures have been developed in co-operation with the Local Safeguarding Children Board (Southend, Essex and Thurrock) and comply with the guidance entitled 'Safeguarding Children in Education: Dealing with Allegations of Abuse against Teachers and Other Staff' (Department of Education 2011) and Working Together to Safeguard Children (March 2010). In relation to vulnerable adults: Safer Practice, Safer Learning 2007, Southend on Sea Adult Protection Procedures (2002).

The College's policies and procedures are formulated, and adhere to the following legislation:

- The Children Act 1989
- Section 175 of the Education Act 2002
- The Children Act 2004

New safeguarding procedures have been developed for Southend, Essex and Thurrock (SET procedures 2011), and have been revised following consultation and feedback from stakeholders.

The College will refer concerns that a child, young person or vulnerable adult might be at risk of significant harm to the relevant Department of Social Care and other agencies.

The Principal and Chief Executive and all staff working with children, young people and vulnerable adults will receive training adequate to familiarise them with child protection procedures and policies. The College will provide refresher training at least every three years. There will be a senior member of the College management team with special responsibility for child protection/safeguarding vulnerable adults.

The College Corporation will receive an annual report from the designated person which reviews how these duties have been discharged.

The College recognises the following as definitions of abuse:-

An abuse is a violation of an individual's human and civil rights by another person or persons

These definitions are drawn from and informed by full definitions of abuse found in the following publications:

No Secrets: DoH 2000

Working Together to Safeguard Children: DFEE 1999 (revision March 2010)

Forced Marriage – Statutory Guidance FCO, HO (2008)

Physical Abuse

Physical abuse is causing harm to a person. It may involve hitting, shaking, throwing, poisoning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of deliberate failure to prevent injury occurring. It may also occur when a parent/carer fabricates symptoms or deliberately induces illness in a child.

Neglect

Neglect is the persistent or severe failure to meet a person's basic physical and/or psychological needs. It will result in serious impairment of health or development. This may include ignoring medical or physical care needs.

Sexual Abuse

Sexual abuse involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the person to be aware that the activity is sexual and the apparent consent of the person is irrelevant.

A child of 13 or under is deemed by the Sexual Offences Act to be unable to give consent.

Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's, young person's or vulnerable adult's behaviour and emotional development/health, which may result in low self worth. Some level of emotional abuse is present in all forms of abuse. Emotional abuse may also include threats of harm or abandonment, humiliation, bullying (and cyber bullying), blaming, controlling, intimidation, coercion, verbal abuse, isolation or withdrawal from services or support networks.

Financial or Material Abuse

This may include theft, fraud, exploitation, pressure in connection with wills, property or inheritance, or the misappropriation of property, possessions or benefits. (DOH 2000)

Discriminatory Abuse

This may include abuse, bullying and harassment based on individuals' age, sex, disability, religion, race, ethnicity or sexual orientation. (DOH 2000)

Forced Marriage (Forced Marriage (Civil Protection) Act 2007)

Forced marriage is a marriage without the full and free consent of both parties. It is a form of domestic violence and an abuse of human rights. Forced marriages are not arranged marriages. In an arranged marriage the family will take the lead in arranging the match but the couples have a choice as to whether to proceed. In a forced marriage this choice is taken away under duress, often including severe emotional pressure and physical abuse. Forced marriage cannot be justified on religious grounds; every major faith condemns it.

Loss of Rights as a Citizen

This happens when a person's individual rights as a citizen are refused or prevented (for example, not being able to vote at elections)

Increased Vulnerability

The College recognises that in certain circumstances young people/vulnerable adults may be at an increased risk of harm and may require additional safeguarding interventions, such circumstances include but are not limited to:

- Under age sexual activity involving 13-15 year olds
- Self harm
- Forced Marriage/Honour based violence
- Disabled Children
- Migrant Children
- Parental disability
- Domestic Violence
- Living away from home
- Begging

Other Related Policies

- Bullying & Harassment
- Student Disciplinary
- Staff Disciplinary
- Equality & Diversity
- Children and Young Peoples Plan
- Restraint Policy
- Safeguarding Policy

Designated Staff with Responsibility for Child and Vulnerable Adult Protection

Senior Staff Member with Lead Responsibility

The designated member of staff with lead responsibility for child protection/vulnerable adult issues is Sue Coole, Vice Principal Learner Support & Community Links. This person is a senior member of the College management team. She has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children, young people and vulnerable adults, and the promotion of an environment which is safe from abuse and harm for all learners within and visiting the College. She has received training in child protection issues and inter-agency working, as required by the Local Safeguarding Children Board, and will receive refresher training at least every two years. She should keep up to date with developments in child protection/vulnerable adult issues.

The lead designated senior member of staff is responsible for:-

- overseeing the referral of cases of suspected abuse or allegations to the Department of Social Care.
- overseeing the management of cases where forced marriage or honour based violence is suspected. The lead designated senior member of staff will have attended additional training in relation to management of forced marriage/honour based violence concerns.
- providing advice and support to other staff on issues related to child protection/vulnerable adults.
- maintaining a proper record of any child protection/vulnerable adult referral, complaint or concern (even when the concern does not lead to a referral).
- ensuring that parents/carers of young people and children within the College are aware of the College's Child Protection/Vulnerable Adults Policy.
- ensuring that carers of vulnerable adults are made aware of the College's Child Protection/Vulnerable Adults Policy.
- liaising with the LSCB and other appropriate agencies
- liaising with secondary schools, and other agencies, which send pupils to the College to ensure appropriate arrangements are made.
- liaising with employers and training organisations that receive children, young people or vulnerable adults from the College on long term placements to ensure that appropriate safeguards are put in place.
- ensuring that staff receive basic training in child protection/vulnerable adult issues and are aware of the College child protection/vulnerable adult procedures (including forced marriage/honour based violence).
- promotion and awareness of all safeguarding issues.

The lead designated member of staff will provide an annual report to the College Corporation setting out how the College has discharged its duties. She is responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the Corporation at the earliest opportunity.

Designated Staff Members

Additional members of teaching/teaching support staff will assist the Vice Principal Learner Support & Community Links with child protection/vulnerable adult issues, as appropriate.

A daily update of designated Child Protection Officers and contact information for each campus is available on the home page of Staff C-Space.

<http://ilsapps/staff/applications/childprotection/>

Other designated members of staff who can undertake the child protection/vulnerable adult procedures and deal with child protection issues are:-

Head of Learner Services

Senior Learning Support Officer (Complex/External Funded)

Learning Support Officer (Complex/FE)

Learning Support Co-ordinator (HE)

Safeguarding Officers

Campus Manager, Basildon

IT User Senior Assistant

Additional members of teaching/teaching support staff will assist the Vice Principal Learner Support & Community Links with child protection issues, as appropriate.

These designated staff members:

- report to the senior member of staff with lead responsibility
- will know how to make an appropriate referral
- will be available to provide advice and support to other staff on issues relating to child protection/vulnerable adults
- have particular responsibility to be available to listen to children, young people and vulnerable adults studying at the College
- will deal with individual cases, including attending case conferences and review meetings as appropriate
- have received training in child protection/vulnerable adult issues and inter agency working as required by the LSCB and will receive refresher training at least every two years

Child Protection and Vulnerable Adult Procedures

Dealing with Suspicions or Allegations of Child Abuse/Abuse of Vulnerable Adults

Introduction

This document covers the procedure for dealing with suspicions or allegations of child abuse or abuse of vulnerable adults.

Scope

The policy will be followed by everyone associated with the College irrespective of site and includes visitors attending College managed premises on official College business but excludes persons involved in approved 'letting activities', i.e. external users of College accommodation. The policy for dealing with suspicions or allegations of child abuse/abuse of a vulnerable adult includes collaborative provision.

Staff refers to all employees, agency staff and volunteers throughout this policy and procedure. This procedure will be followed by any person who has knowledge of, or suspicions of, a child, young person or vulnerable adult suffering significant harm or being at risk of significant harm.

The lead nominated designated Child Protection/Vulnerable Adults Officer is the Vice Principal, Learner Support & Community Links.

Learners who are under 16, and attend the College for part or all of their learning programme, are subject to their School Child Protection Procedures. All referrals related to Under 16s must be made to the lead designated Child Protection Officer or other named designated members of staff. Jungle Cats Nursery, Basildon Campus Pre-School and Thurrock Campus Pre-School have separate child protection policies and procedures, as required by Ofsted.

Procedure

It is important that children, young people and vulnerable adults are protected from abuse. When a member of staff becomes aware of an allegation or alleged incident, they should immediately go to a DCPO. This should take priority over your usual duties and notifying your Manager in the first instance.

Practitioners working within the field of education need to be aware of the "one chance" rule – that they may only have one chance to prevent further risk or save a life. If the victim is allowed to walk out of the door, that **one** chance may be wasted.

Where complaints, allegations or suspicions are against the nominated members of staff these should be referred to the Executive Director Finance and Corporate Services with responsibility for HR.

This procedure must be followed immediately whenever an allegation is made that a child, young person or vulnerable adult has been abused or when there is a suspicion that a child, young person or vulnerable adult has been abused or is at risk of significant harm.

The suspicion or allegation may involve other family members, learners at the college, employees of the College or other persons. Alleged abuse may take place on or off site.

The College aims to ensure the learning environments are supportive and safe, where individuals are treated with courtesy and respect and their contribution to learning is valued. The College will not tolerate harassment or bullying in any form and will take firm action to protect its learners whenever incidents are identified (Learner Harassment and Bullying Policy). In rare incidences staff may be made aware of abuse of learners by other learners. Staff should make themselves familiar with the Harassment and Bullying Policy and Procedure. In such circumstances it may also be necessary to instigate Vulnerable Adult/Child Protection procedures. Abuse is defined on page 2 of the Child Protection Policy, and the procedure for dealing with such incidents is outlined below. Designated staff will consider whether the incident requires a referral to the Police or Department of Social Care. Learner Services Counsellors are able to provide a confidential service to victims of abuse/assault and any learner involved will be offered access to the service.

Reporting Allegations or Suspicions

Staff should not investigate concerns or allegations themselves, but should report immediately to the Child/Vulnerable Adult designated person(s). Referrals to Department of Social Care should only be made by the designated person or her named nominees.

If a child, young person or vulnerable adult tells a member of staff about possible abuse the member of staff should:-

- listen carefully and stay calm
- arrange for the person making allegation and person accused of allegation to remain on site
- reassure the child, young person or vulnerable adult that by telling you they have done the right thing
- avoid interviewing the child, young person or vulnerable adult but should clarify without resorting to leading questions and without exerting pressure, what the child, young person or vulnerable adult is saying
- not put words into the child's, young person's or vulnerable adult's mouth

- inform the child, young person or vulnerable adult that you must pass information on, but only to those who need to know about it will be told. Inform them of to whom you will be reporting the matter
- note the points carefully
- make a detailed note of the date, time, place, what the young person said, did, and questions asked
- report the concerns immediately to a DCPO and then complete a referral form, attaching a copy of any other notes taken
- out of hours all concerns should be reported immediately to Learner Services or in their absence the Evening & Weekend College Manager who will contact a DCPO or LDCPO.

Once details of a Child Protection/Vulnerable Adult concern have been received by a DCPO, the following procedures/working practices will be undertaken:

- DCPO will request the fully completed referral form and that the young person for whom concerns exist be requested to remain in College until notified by DCPO.
- Case accepted by DCPO.
- DCPO meets with staff/child/vulnerable adult as applicable – record of meetings taken using record sheets as applicable.
- In the event of an emergency DCPO may contact Police, other less immediate referrals to the Police should be discussed with LDCPO or another member of the Senior Leadership Team, or the Head of Learner Services in the first instance.
- Range of additional interventions considered using **Common Assessment Framework** by DCPO. When applicable DCPO discusses case with another DCPO or refers to LDCPO. This could include:
 - Primary carer informed of concerns/ action being taken (where appropriate as determined by DCPO). In line with statutory guidance this must not take place in cases where forced marriage is suspected.
 - Contact made with relevant First Contact Team or appropriate team for Vulnerable Adults
 - Follow up referral made to relevant First Contact Team/appropriate team where deemed appropriate and where agreed with Social Care Team
 - Other referrals to be made and advice provided to child/vulnerable adult (logged)
- Log updated to reflect action taken and appropriate `traffic light` is to be set on College system

- File to be made up and stored securely until such times that all required actions are completed.
- File to be transferred to permanent and secure storage area
- Where no Child Protection issues are present but additional needs are identified and, according to the judgement of practitioners, the young person requires extra support to ensure they meet the five Every Child Matters outcomes, the Common Assessment Framework will be applied.
- Where the DCPO considers additional complexities apply, they may request attendance by a second DCPO whose primary role will be to share in decision making, record the incident, and clarify understanding of all involved.

It is important to remember that adult protection guidelines are intrinsically different to those applying to children. Adults have the right to make their own decisions unless there are clear grounds to override this because of their lack of capacity or if a wider public interest is involved.

Reporting and Dealing with Allegations of Abuse against Members of Staff

Procedure

Introduction

In rare instances, staff of education institutions have been found responsible for abuse. Due to their frequent contact with children, young people and vulnerable adults, staff may have allegations of abuse made against them. The College recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that the investigation is thorough and not subject to delay.

The College recognises that the Children Act 1989 and No Secrets (Department of Health 2000) states that the welfare of the child, young person or vulnerable adult is of paramount concern. It is also recognised that hasty or ill informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore those dealing with such allegations within the College will do so with sensitivity and will act in a careful, measured way.

Safe Care Practices in College

In the College there are times when learners will be seen individually by staff. Some learners require support for intimate care (assistance in toileting, etc.). Safe care practices have several key objectives:-

- To keep learners safe from abuse
- To ensure the College is a safe environment in which to study and work
- To minimise the risk of staff receiving false allegations of abuse, strategies for safe caring need to be adopted by all staff employed at the College to achieve the above objectives:-
- Maintain good communication with other staff, e.g. if you are about to interview a learner alone, inform other staff
- Whilst it may be appropriate to verbally reassure a learner, physical affection should be avoided
- Staff should communicate to their line manager if they feel uncomfortable in the presence of a learner e.g. male learner who makes sexualised remarks to a female member of staff. The line manager should raise the issues with the lead designated person.
- Staff should avoid intimate care, e.g. helping learners' toileting, which should be the responsibility of the learners' carer at all times.
- Staff should be familiar with the student code of conduct and reiterate this to learners.
- Under the Sexual Offences Act 2003 it is an offence for a person over 18 (teaching/teaching support staff) to have a sexual relationship with a child/young person under 18 where the person is in a position of trust in respect of that child/young person, even if the relationship is consensual. This applies where the child/young person is in full time education and the person works in the same establishment as the child/young person, even if s/he does not teach the child/ young person.

Whistle Blowing

The College's Whistle Blowing Policy and Procedure is intended to provide safeguards to enable concerns to be raised and to maintain public confidence in the reputation of the College and should be followed by staff when relevant, in instances related to child/vulnerable adult protection.

Receiving an Allegation from a Child/Young Person/Vulnerable Adult

A member of staff who receives an allegation about another member of staff from a child/young person/vulnerable adult should follow the guidelines for dealing with disclosure.

The allegation should be reported immediately to the Human Resources Manager or Executive Director Finance and Corporate Services who will confer with the lead designated person and inform the Principal and Chief Executive.

The Human Resources Manager or Executive Director Finance and Corporate Services will:

- obtain written details of the allegation from the member of staff who received the complaint/concern which should be signed and dated. The written details should be countersigned and dated by the Human Resources Manager or Executive Director Finance and Corporate Services (copy to the lead designated person)
- record information about times, dates, locations and names of potential witnesses.

Initial Assessment by the Human Resources Manager or Executive Director Finance and Corporate Services and Lead Designated Person

The Human Resources Manager or Executive Director Finance and Corporate Services and the lead designated person should make an initial assessment of the allegation. The lead designated person may consult with the Department of Social Care or Police, as appropriate.

The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants immediate action or further investigation.

Where the allegation is considered to be either a potential criminal act or indicates that the child/young person/vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately via the Local Authority Designated Officer (LADO) to the Department of Social Care.

In such situations the matter will be assessed and appropriate immediate action taken in accordance with the College Disciplinary Policy and Procedure and the Department of Education Document: Dealing with Allegations of Abuse against Teachers and other staff (2011).

Suspension from duties along with other options will be considered appropriate in situations where a child/young person/vulnerable adult is assessed to be at risk, where the allegation is sufficiently serious and may justify dismissal on the grounds of gross misconduct or where necessary to enable a fair investigation process. The aim will be to immediately safeguard the learner, the staff member whom the allegations have been made against and other learners and staff.

In instances where there is no cause to suspect that 'significant harm' is an issue, but a criminal offence may have been committed, the Police will also be consulted

Other potential outcomes are:-

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child/young person/vulnerable adult. This matter should be assessed in accordance with the College Disciplinary Procedures.
- The allegation can be shown to be false because the fact alleged could not possibly be true. Even in this event the Local Authority Designated Officer should be consulted.

Enquiries and Investigations

Child/Vulnerable Adult protection enquiries by Department of Social Care or the Police are not to be confused with internal disciplinary enquiries by the College. The College may be able to use the outcome of an external agency enquiry as part of its own procedures.

The Child/Vulnerable Adult Protection agencies, including the Police, have no power to direct the College to act in a particular way; however the College should assist agencies with their enquiries.

The College shall normally hold in abeyance its own internal enquiries while the formal Police or Department of Social Care investigations proceed; to do so otherwise may prejudice the investigation. However, in certain circumstances, where the joint evaluation process may deem that there is sufficient evidence for matters to be taken forward in a disciplinary process parallel with the criminal process, without jeopardising the criminal investigation, all relevant parties may reach an agreement about the way forward with regard to these parallel investigations.

Any internal investigations shall conform to the existing staff Disciplinary Policy and Procedures. If there is an investigation by an external agency (e.g. Police) the Human Resources Manager or Executive Director Finance and Corporate Services and the lead designated person should normally be involved in, and contribute to, the inter-agency strategy discussions. The Human Resources Manager or Executive Director Finance and Corporate Services and lead designated person are responsible for ensuring the College gives every assistance to the agencies enquiries. They will ensure that appropriate confidentiality is maintained in connection to the enquiries, in the interests of the member of staff about whom the allegation is made. Subject to no objections from the Police or investigating agency, the lead designated person accompanied by another designated person shall:-

- inform the child/young person/vulnerable adult or parent/carer making the allegations that the investigation is taking place and what the likely process will involve
- ensure the parents/carers of the child/young person making the allegations have been informed that the allegation has been made and what the likely process will involve
- Where a vulnerable adult is concerned, consent is required from the adult

The Human Resources Manager or Executive Director Finance and Corporate Services will:

- inform the member of staff against whom the allegation has been made of the fact that the investigation is taking place and what the likely process will involve
- keep a written record of the action taken in connection with the Allegation
- appoint an Investigating Manager to progress a fair and thorough investigation in line with the Disciplinary Policy and Procedure

The Principal and Chief Executive will inform the Chair of the Corporation of the allegation and the investigation.

Action on conclusion of a case

The Principal and Chief Executive should give consideration to what information should be made available to the general population of the College. If the allegation is substantiated and the person is dismissed or the College ceases to use the person's services, or the person resigns or otherwise ceases to provide his/her services, the College will consider whether a referral to the Independent Safeguarding Authority (ISA) for consideration of List 99 action or by the General Teaching Council (GTC) is required, or advisable, and the form and content of a referral.

In cases where it is decided on the conclusion of the case that a member of staff who has been suspended can return to work, the College will carefully consider how best to facilitate and support that return to work.

Allegations without Foundation

False allegations, by the child/young person/vulnerable adult, may be indicative of problems of abuse elsewhere. The following steps should be taken in such cases:

- A record should be kept and consideration given to a referral to Department of Social Care in order that other agencies may act upon the Information

- In consultation with the lead designated member of staff the Human Resources Manager or Executive Director Finance and Corporate Services shall inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child/vulnerable adult protection action will be taken
- Consideration should be given to offering counselling/support
- The lead designated person will inform the parents/carers of the alleged victim that the allegation has been made and the outcome. In the case of vulnerable adult, the adult's consent is required.
- Where the allegation was made by a child/young person/vulnerable adult other than the alleged victim, consideration to be given to informing the parents /carers of that child/young person
- The Human Resources Manager or Executive Director Finance and Corporate Services and lead designated person will prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming the above action has been taken

Malicious/Vexatious Allegations

When an allegation is unfounded and there is evidence through the investigation that the allegations could potentially be malicious, the Student Disciplinary Policy will apply if such a malicious/vexatious allegation was from a learner or the Staff Disciplinary Procedure if such an allegation was from a member of staff.

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcomes and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file with a copy provided to the person concerned. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the Independent Safeguarding Authority (ISA)

Monitoring Effectiveness

When an allegation has been made against a member of staff the Human Resources Manager or Executive Director Finance and Corporate Services and the lead designated person should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to improvement of the College's procedures and/or policies which should be drawn to the attention of the Local Safeguarding Children Board and/or Department of Social Care. Considerations should also be given to the training needs of staff.

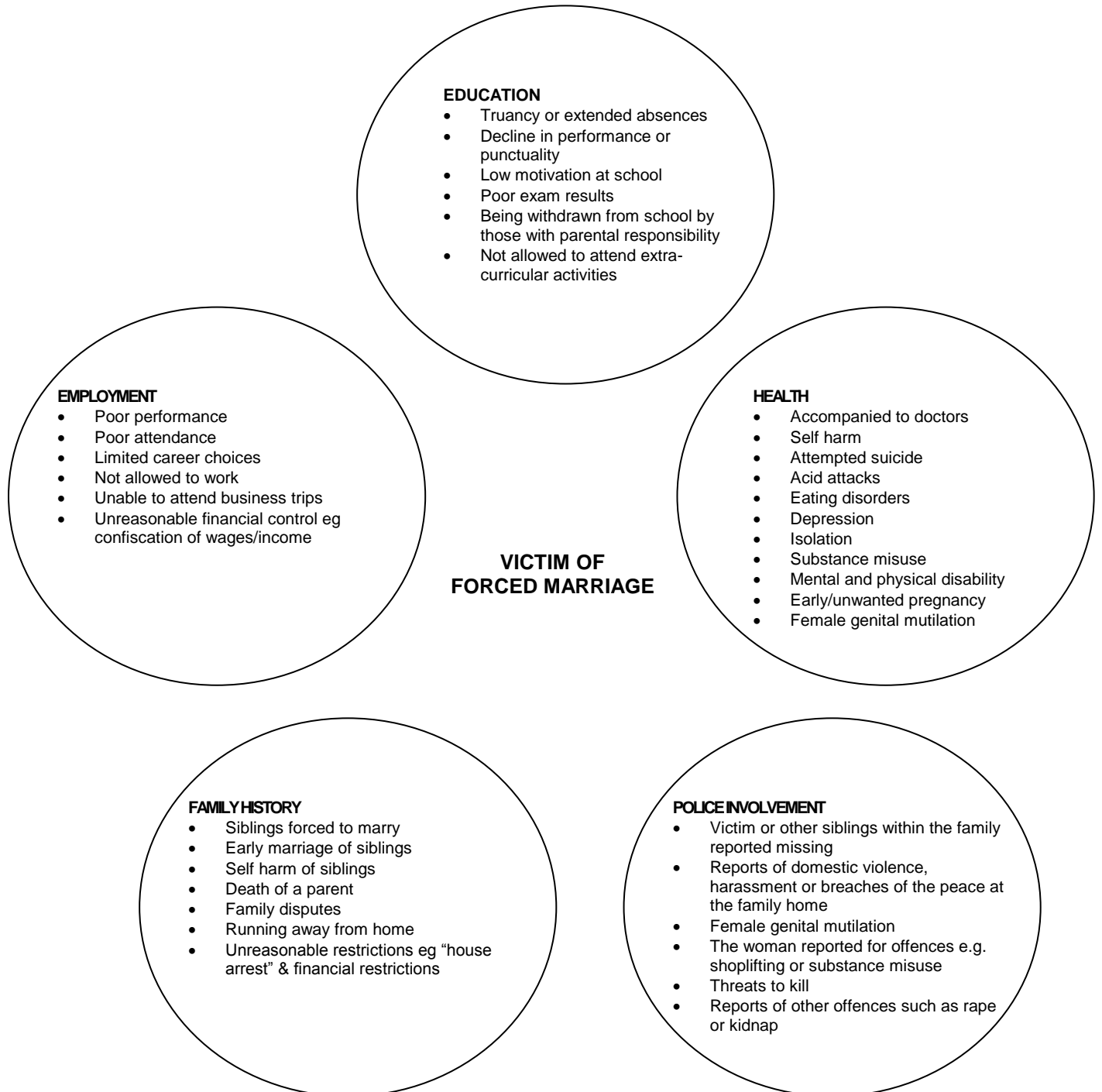
Recruitment and Selection Procedures

The College already has a range of checking procedures in place as part of its recruitment and selection process such as:-

- They apply to staff and volunteers who may work with children/young people/vulnerable adults
- The post or role should be clearly defined
- The key selection criteria for the post or role should be identified
- Vacancies are advertised widely in order to ensure a diversity of applicants
- Documentary evidence of academic/vocational qualifications is required
- Minimum of two Professional / Educational references are obtained prior to an individual working at the College
- Previous employment history is verified
- List 99 checks are completed on all staff, volunteers, agency workers engaged within the College
- Criminal Records Bureau Enhanced disclosure checks must be undertaken
- A variety of selection techniques are used (e.g. qualifications, previous experience, interview, reference checking, etc.)

The College will ensure this process is reviewed regularly to ensure they continue to comply with legislative requirements.

WARNING SIGNS OF A VICTIM OF FORCED MARRIAGE



APPENDIX 2

MOTIVES PROMPTING FORCED MARRIAGE

Some of the key motives that have been identified are:

- Controlling unwanted behaviour, for example, alcohol and drug use
- Controlling unwanted sexuality (including perceived promiscuity, or being lesbian, gay, bisexual or transgender) – particularly the behaviour and sexuality of women
- Protecting “family honour”
- Responding to peer group family pressure
- Attempting to strengthen family links
- Ensuring land, property and wealth remain within the family
- Protecting perceived cultural ideals (which can often be misguided or out of date)
- Protecting perceived religious ideals which are misguided
- Preventing “unsuitable” relationships, eg outside the ethnic, cultural, religious or caste group
- Assisting claims for UK residence and citizenship
- Long standing family commitments