

# Safeguarding Policy

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## 1. Introduction

### 1.1 Purpose

1.1.1 The purpose of these Procedures is to set out the West London School of Beauty Ltd's ('the Centre') approach to safeguarding of Children, Young Persons and Adults at Risk.

1.1.2 The Centre is mindful of its duty of care and legal obligations.

1.1.3 The Centre is subject to a general duty of care at common law to deliver its educational and wider services to the standard of the ordinarily competent Centre, and, in carrying out its services and functions, to act reasonably to protect the health, safety and welfare of its students. It is however recognised that education providers are not professional health or support providers, and do not act in loco parentis. The Centre is also subject to a common law duty of care to both its employees and visitors.

1.1.4 In addition, the Centre is mindful of its duty of care and further legal obligations under statute, including, but not limited to, the Health and Safety at Work Act 1974, Safeguarding Vulnerable Groups Act 2006, Counter-Terrorism and Security Act 2015, and Equalities Act 2010. The Centre is further mindful of its obligations derived under its contractual provisions with students.

1.1.5 Bearing in mind the various sources of its duty of care, it is recognised that the Centre has an enhanced duty towards those under the age of 18 and vulnerable adults to ensure that they are safeguarded against the risk of abuse, and to pay due regard to the need to prevent people from the risk of being drawn into terrorism as part of its safeguarding duties. In order to assist it to discharge its duty of care, the Centre is required to ensure that it has in place effective and robust systems, policies and procedures, together with providing training to relevant staff. The framework for this provision in respect of safeguarding is set out in this document.

1.1.6 These Procedures applies to all members of the Centre. However, it is specifically aimed at staff, students and volunteers who encounter the following groups through teaching, research, professional services and outreach activities:

- Children (up to the age of 18)
- Adults at Risk

An Adult at Risk of abuse or neglect is defined as someone aged over 18 or over who has needs for care and support, who is experiencing, or at risk of, abuse or neglect and as a result of their care needs - is unable to protect themselves.

1.1.7 This Policy seeks to support these activities and to offer assurances to both staff, students, volunteers and visitors that, through its implementation, the Centre seeks to protect Children, Young Persons and Adults at Risk and to keep them safe from harm when in contact with students and staff (whether acting in a paid or unpaid capacity).

### 1.2 Scope

These Procedures applies to all Centre activities undertaken at the Centre's locations, and where off-campus activities are not subject to safeguarding procedures elsewhere.

These Procedures applies to all staff and students of the Centre, including those that do not

have a specific role in relation to safeguarding matters, who may come into contact with a Child or Adult at Risk as part of their work or activities. This policy also applies to situations where a student or staff member may pose a safeguarding risk outside of Centre activities.

The Centre reserves the right to request appropriate safeguarding policies and assurances from contractors and placement providers.

The Centre expects organisers bringing under-18s onto its premises, e.g. for interview, applicant and open days, conferences, summer schools, school visits or work experience to ensure they have local safeguarding procedures and are familiar with relevant Centre policies.

### 1.3.1 Definitions

*Abuse* - can be in the form of

- Physical abuse
- Child sexual exploitation
- Neglect or acts of omission
- Extremism
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery and child trafficking
- Discriminatory abuse
- Organisational abuse

As outlined by [Working Together to Safeguard Children](#) (Dec 2020) and [Care Act 2014](#)

*Adult at Risk* - an adult who:

(a) has needs for care and support,

(b) is experiencing, or is at risk of, abuse or neglect, and

(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

*Child* - For the purposes of this policy, the Centre defines a child as a person who is under the age of 18.

*Prevent* - The Prevent duty is the duty in the Counter-Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

*Safeguarding* - For the purpose of this policy, the Centre defines safeguarding as protecting children and adults at risk who may be at risk of exploitation (including radicalisation), harm, neglect or abuse as well as promoting the welfare of our community.

## 2. Procedures Principles

World For You Ltd takes seriously its responsibility to safeguard and promote the welfare of any member of the Centre community and to work together with other agencies to ensure that adequate arrangements are in place to identify, assess, and support any member of the Centre community who may be suffering from abuse, harm or neglect; or is at risk of being drawn into terrorism and being radicalised, we will do this by following these principles.

- a) The Centre will take all safeguarding concerns relating to Children and Adults at Risk seriously, will consider concerns fully and will report any such concerns in a timely manner to the relevant person or body.
- b) Safeguarding referrals to the relevant statutory body will be made based on identified and evaluated risk, as per the procedures outlined in section 3 of these procedures.
- c) Local authorities have the responsibility to lead in investigating safeguarding concerns, but every organisation and everyone who encounters a Child or Adult at Risk has a responsibility to help keep them safe.
- d) The Centre will ensure it maintains central records of any safeguarding concerns and any referrals made consequently. Any records will be kept in accordance with the Centre's Data Protection Policy.
- e) Centre staff working with students or staff who are the subject of safeguarding concerns will consider what support may be offered to the individual and will signpost accordingly. This may include referral to internal and/or external services.
- f) In a placement and/or professional work experience setting, a member of staff or student should normally report any safeguarding concern to the employer's Designated Safeguarding Lead, as per the employer's policy. As a matter of course, the safeguarding concern must also be reported to the Centre's Designated Safeguarding Lead (DSL) as per the procedure set out in section 3.
- g) The Centre has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of Children or Adults at Risk. The Centre is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate.

### 3 Summary of Procedures

#### Reporting a Safeguarding Concern

##### Making the Report

The duty to investigate suspected abuse or harm rests with statutory services, primarily Social Care Services and the Police.

##### **Sources of concern:**

Examples of safeguarding concerns include, but are not limited to:

- a. A child or adult raises an allegation of abuse, harm or other inappropriate behaviour.
- b. A student or staff member discloses information involving themselves or others which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals or children involved in Centre activities.
- c. There are suspicions or indicators that a Child or Adult at Risk is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation). The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member's responsibility to decide whether a Child or Adult at Risk has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have.
- d. There are observable changes in a Child or Adult at Risk's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation).
- e. A concern is raised that an individual presents a risk of abuse or harm towards a Child or Adult at Risk in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material.
- f. Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

### **Reporting Safeguarding Concerns**

A safeguarding concern is reported by completing the Safeguarding Reporting Form (appendix 3). The form should be submitted within one working day by email [info@aceacademytraining.com](mailto:info@aceacademytraining.com) and the DSL will respond as promptly as possible, but generally within same working day of the incident giving rise to the concern. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one due to uncertainty. Staff may wish to discuss safeguarding concerns with the Designated Safeguarding Officer should they be in any doubt as to whether to make a report.

All reports will require the Safeguarding Reporting Form to be completed, however if a student or staff member has an immediate and significant concern for a child or adult at risk's immediate safety, they may refer the matter directly to the Police or Social Care Services and DSL before completing the reporting form.

Contact details are provided on the Centre's Safeguarding pages.

For all reports of a safeguarding matter

- a) Listen carefully and stay calm.
- b) Take all complaints and allegations seriously.
- c) Ensure the immediate safety of the person affected.
- d) Reassure the individual they have done the right thing by telling you and what they have reported will be escalated but do not assure their confidentiality.
- e) Keep questions to an absolute minimum, do not interrogate the individual or ask leading questions. Any questions should be about any immediate health and safety concerns.
- f) Explain to the individual that you will need to report the matter to the Centre's DSL
- g) and explain the Centre's internal process as outlined below.
- h) Request consent to share the information with the DSL relevant external agency.
- i) Complete a report as per Appendix 3 Provide as much detail as you can.

### **Reports about Safeguarding concerns**

If you suspect or are concerned that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation).

- a) Never wait until a child or adult at risk tells you directly that they are being abused before acting.
- b) If you are concerned ask the child or adult if everything is OK. Support the child or adult as appropriate. If a disclosure is made follow the steps above.
- c) If you are still unsure, discuss with the DSL.

On receipt of a referral the Safeguarding Officer will limit their enquiries to that necessary to undertake a risk assessment and:

- a) Address any serious and immediate risk to the Child or Adult at Risk.
- b) Preserve any evidence likely to be lost before external agencies can respond.
- c) Determine the appropriateness of a referral to Surrey Social Care Services, the Police or another appropriate agency and provide sufficient information to the relevant external agency to enable an effective response.
- d) Identify any internal/external support required by the Child or Adult at Risk.
- e) They may decide that no further action is required.

If a referral to an external agency is deemed appropriate, the DSL or Safeguarding Officer

or their nominee will make the referral.

If a member of staff wishes to discuss a potential referral before completing the Form, they may contact a Safeguarding Officer to discuss the referral in principle without providing any names or identifying details.

Where the suspected abuse is alleged to have been carried out by a staff member, the Centre will work alongside external agencies, including but not limited to the Local Authority Designated Officer (LADO) during any investigations. If necessary, the staff disciplinary procedures may be invoked.

### **Prevent**

Where Prevent concerns are raised about a person who is responsible for a Child or Adult at Risk and the concerns raised may indicate a risk to the safety of the Child or Adult at Risk or wider community, this should be reported following the same process above. Any Prevent concerns raised with the DSL will be shared with the Prevent Lead for the Centre.

### **Record keeping**

The Designated Safeguarding Officer will be responsible for ensuring that a full record is kept of the risk assessment process and of any action taken subsequently. This will be done in accordance with the Centre's Data Protection Policy.

In admitting students under the age of 18 the Centre acknowledges that it will have an enhanced duty towards these individuals as they are Children.

## **6 Disclosure and Barring Service (DBS) Checks**

The Centre will ensure that any staff or students working with Children or Adults at Risk on a substantial basis, or having close, unsupervised contact with Children or Adults at Risks, will have an appropriate DBS check carried out. This is part of the World For You Ltd Recruit process prior to employment of the staff member.

Staff and students without satisfactory disclosure from the DBS should not be given unsupervised access to children/adults at risk and it is the responsibility of their line manager or supervisor to ensure that procedure is followed. Responsibility for ensuring such checks are conducted rests with the line manager.

DBS checks will be renewed every 3 years, upon significant change of role or remit.

### **Governance Requirements**

#### **Responsibility**

Overall responsibility for the Centre's response to safeguarding rests with the Chief Student Officer.

The Head of Centre is the Designated Safeguarding Lead.

Their responsibilities, or that of their nominees, include:

- a) Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date;
- b) Acting as a source of support, advice and expertise to staff on matters of safeguarding;
- c) Acting as a point of contact for those who have safeguarding concerns, receiving information and recording those concerns;
- d) Acting upon concerns as appropriate in the circumstances for example by making external

- referrals to local authorities or police;
- e) Produce safeguarding statistics and annual overview;
- f) Providing training to staff, as required.

All members of the Centre are expected to play an appropriate role in reducing the risk of harm to staff and students. Initially, all staff must pass on and discuss their concerns swiftly with a relevant party so that the issue can be explored with someone who has a specialist understanding of safeguarding, this may include completing a referral form. In the first instance, staff should discuss concerns with their line manager who can then escalate as appropriate.

Local authorities have the responsibility to lead in investigating safeguarding concerns referred to them.

#### 8. **Monitoring**

The DSL will record any incidents relating to safeguarding concerns and will report them annually in an anonymised form to the Prevent and Safeguarding Steering Group.

Monitoring will provide a strategic understanding of the scale and trends of the safeguarding concerns to allow for more targeted intervention and improved proactive approaches.

#### 9. **Implementation / Training/Communication Plan**

The Centre will endeavour to increase awareness and understanding of safeguarding responsibilities, to ensure all staff understand what safeguarding is and what they should do if they become concerned about a student.

Safeguarding procedures will be included in briefing packs, handbooks and presentations as part of pre-event staff briefing sessions for our events which attract under 18 audiences.

#### 10. **Exceptions to these Procedures**

Providing a safe environment and response to known risks to reasonably protect students from harm is required by legislation. There are no exceptions to these procedures. Each case will be treated in line with these procedures and individual circumstances.

#### 11. **Review and Update**

These Procedures will be reviewed every year while the procedures are new, or sooner if a change in legislation requires that this is necessary. Any minor changes, such as changes to roles, will be undertaken by the operational owner.

#### 12. **Legislative context**

The [Health and Safety at Work Act \(1974\)](#) places a duty on the Centre to do what is reasonably practicable to protect the health safety, and welfare of staff, students and visitors.

Other government policies relevant to safeguarding are:

- [Care Act 2014](#)
- [The Children Act \(1989\)](#)
- [The Data Protection Act \(1998\)](#)
- [The Safeguarding Vulnerable Groups Act \(2006\)](#)
- [The Protections of Freedom Act \(2012\)](#)
- [The Counter-terrorism and Security Act \(2015\)](#)
- [Working together to safeguard children \(2018\)](#)
- [Department for Education Keeping children safe in education 2021: Statutory guidance for schools and colleges](#)

## Appendix 1 - Examples of safeguarding concerns

Examples of types of situations which may present a safeguarding concern are provided below. This list is not exhaustive and staff will need to exercise professional judgement in determining whether there are safeguarding concerns which need to be considered.

- a) A Child or Adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour;
- b) A student, staff member or visitor discloses information involving themselves, family members or any other child or adult which gives rise to concerns that an individual may be harming or abusing a Child or Adult at Risk;
- c) There are suspicions or indications that a Child or Adult at Risk is being abused or harmed or is at risk of exploitation (including radicalisation), harm, neglect or abuse.
- d) There are observable changes in a Child or Adult at Risk 's appearance or behaviour that may be related to exploitation, harm or abuse, including radicalisation.
- e) A concern is raised that an individual presents a risk of abuse or harm towards a Child or Adult at Risk. If there is a concern that a member of staff or student may present such a risk the Centre will carry out a risk assessment and, if appropriate, invoke other appropriate policies, including Disciplinary or Fitness to Study procedures or the Criminal Convictions Policy.
- f) Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of the individual being drawn into terrorism.
- g) A historic disclosure of sexual or physical abuse is made, where the perpetrator still has access to Children or Adults at Risk.
- h) Activities that should be discussed with DSL or line manager with safeguarding in mind eg. work experience placements, outreach activity to engage under 18s, visiting schools, online chat or events for prospective students.

The following incidents MUST be reported to the DSL/ Safeguarding Officer:

- a) If a Child or Adult at Risk is accidentally hurt
- b) If you are concerned that a relationship is developing with a Child or Adult at Risk, which could represent an abuse of trust
- c) If you are concerned that a Child or Adult at Risk is becoming attracted to you
- d) If you are concerned that a colleague is becoming attracted to a Child or Adult at Risk
- e) If a Child or Adult at Risk misunderstands or misinterprets something you have done in a way which could be construed to be abusive or harmful
- f) If you have to use reasonable physical restraint to prevent a Child or Adult at Risk from harming themselves or another, or from causing significant damage to property
- g) If a Child or Adult at Risk reports an allegation of abuse regarding a member of an external organisation using Centre facilities.
- h) Any students under 18 or adult at risk with mental health issues
- i) Any students under 18 or adult at risk involved with criminal activities or prevent concerns
- j) If a Child or Adult at Risk reports concerns regarding a forced marriage or Female Genital Mutilation.
- k) Any students under 18 or adult at risk if they go missing.

**Definitions and signs of child abuse: <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>**

**Appendix 2 - Safeguarding Safety Concern Form**

Please use this form to outline the nature of your concern.

If you cannot complete a section, or feel a section is not relevant then leave it blank.

Your disclosure will be treated sensitively. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain.

If there is immediate risk, please call 999 to report to the Police and/or Ambulance service

Name of Child/Adult at Risk Student/Staff member (if known):

Date of birth or age:

School (if known) Gender:

(M/F/other)

Address

Description of the safeguarding issue (see Safeguarding Procedures for more information about what constitutes a safeguarding concern). Your description might include a factual account of something you have witnessed, they have disclosed or an account of something a third party has reported to you.

Time, location, date of the incident/s: (if known)

Any other observations/information: (including any physical injuries, use a body map)

Any previous reports

Have you discussed this referral with the affected party? If not, please explain

Signed:

Date:

Name(print):

Position:

Your Preferred Contact Method (Tel ext.: mobile: email)

Section 2 to be completed by the DSL

Is the child or adult at risk who is the subject of concern at immediate risk?	
Yes/no	
Details	
Does the incident relate to an allegation about a student or member of staff?	
Should the staff or student be referred for consideration of disciplinary action?	
Does the reporting incident require referral to a local safeguarding team?	
Does the reported incident constitute a criminal offence and requires a referral to the Police?	
Actions undertaken:	
No further action Referral to HR Reported to local safeguarding team Reported to DSL Referred to existing policy/procedure Referred to internal department Reported to Police	
Details	
Signed	
Date	

Designated Safeguarding Lead contact details:  
 Kailash Kutwaroo - 07511 937137 - londonacebeautyacademy@gmail.com