



Safeguarding Policy

Context

All students who attend Project X are 18 years of age and over. We provide residential accommodation.

Terminology

The following terminology is used throughout this policy and other school policies. It is important that all members of staff are familiar with the terms used, and where a term refers to a named person, they know who that person is and how they can be contacted.

Adult at risk of harm – Any student or visitor to the school whose personal circumstances may make them more vulnerable than many other adults. It is also frequently shortened to 'adult at risk'. Factors that may deem someone to be an adult at risk may include a physical disability (e.g. sight/hearing impairment, mobility impairment), special needs (e.g. learning difficulties, dyslexia), level of English (students with a low level of English may not fully understand instructions or be able to effectively express a concern), lack of local knowledge (unfamiliar with the local vicinity or customs). Each student's level of vulnerability may depend on the context and it cannot be assumed that someone who is not regarded as an adult at risk within the school premises doesn't become vulnerable off-site.

Designated Safeguarding Lead (DSL) – A named member of staff, trained to Specialist Safeguarding for the DSL, who has full overall responsibility to ensure Project X meets the aims of this policy.

Designated Safeguarding Person (DSP) – A named member of staff trained to Specialist Safeguarding for the DSL, who can support the DSL and cover in their absence.

Duty of Care – The school's obligation to look after the wellbeing of all students but in particular adults at risk, and help them to achieve their potential.

Statement of Policy

We strive to make Project X a safe and welcoming place for all students. However, we recognise that we have a duty of care towards any adults at risk who attend the course or who are in other ways associated with the course. This duty of care applies to all adults associated with the school. All our policies and procedures are designed to ensure that we are vigilant to ensure we are able to identify students who are potentially vulnerable to harm.

All students and visitors who fall into the category of adult at risk are entitled to be protected under this policy regardless of their race, nationality, age, gender, gender identity, sexual orientation or religious belief.

Staff Responsibilities related to Safeguarding

A detailed description of the responsibilities all staff and other adults connected to the course have in relation to safeguarding adults at risk can be found in the sections below. The overarching principles are that all adults have the responsibility to safeguard adults at risk, be vigilant and know to report concerns, including small ones, or allegations, and who to contact both within and beyond Project X. All staff must be trained in Safeguarding to the level of Basic Awareness, all Designated Persons and the Designated Lead to the level of Specialist Training for the DSL.



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Designated Safeguarding Team

The following members of staff form the Designated Safeguarding Team

Designated Safeguarding Lead (DSL) Jon Crocker

Designated Safeguarding Person (DSP) Estera Esti

In the absence of the DSL, the DSP assumes the responsibilities.

Weekly meetings are held to discuss any ongoing student welfare and safeguarding issues. Staff are encouraged to speak to the DSL or DSP at any time if they have a concern or are unsure about anything connected to Safeguarding.

Legal Framework

This policy is informed by the following:

Local Government Act 2000

The Sexual Offences Act 2003

Protection of Freedoms Act 2012

Counter-Terrorism and Security Act 2015

Code of Conduct

Statement of Intent

It is the policy of Project X to safeguard the welfare of all adults at risk and to protect them from all forms of abuse including physical, emotional and sexual harm.

This organisation is committed to creating a safe environment in which all students can feel comfortable and secure while engaged in any Project X programme. Staff must at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately.

Guidelines for all Project X Staff

Attitudes

Staff must be committed to:

- Acting professionally at all times.



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- Treating adults at risk with respect and dignity.
- Always listening to what an adult at risk is saying.
- Valuing each adult at risk.
- Recognising the unique contribution each individual can make.
- Encouraging and praising adult at risk.

By Example

Staff must endeavour to:

- Provide an example, which we would wish others to follow.
- Use appropriate language with young people and challenge any inappropriate language used by an adult working with young people.
- Use neutral language at all times in order to prevent any misunderstanding of intent, or possible accusations of misconduct.
- Respect a young person's right to privacy.
- Arrive punctually for all work duties.

Prohibited Actions

Staff may not engage in any of the following activities:

- Drink alcohol in front of students except at events where this has been approved by Senior Management, and in such cases only in moderation.
- Make light of or promote any perceived pleasures of smoking, alcohol or drugs.
- Initiate any form of physical contact or engage in inappropriate physical contact with any student. (See below for more information on this).
- Be in a romantic or sexual relationship with any student.
- Meet any student outside of the work environment unless this meeting is work-related (e.g. meeting a group of students for a Social Programme activity).
- Have contact with any student via the internet or any type of media including email, social networking sites or any other type of social media, unless this contact is part of normal work duties
- Do things of a personal nature for an adult at risk that they can do for themselves.
- Accept gifts of a high value from students at any time. Small gifts of low value from students are acceptable.
- Any action where you could be accused of favouritism towards any student.

"Inappropriate physical contact" may be difficult to define in a multi-cultural environment, when students from some other cultures may be more tactile. Staff are therefore prohibited from initiating any physical contact with a student or, if alone with a student, from engaging in physical contact if initiated by the student. Students may wish to have a photograph taken with a member of staff and it is quite natural in this situation for the student to place their arm around the member of staff. This is deemed acceptable provided that the staff member is not alone with the student, the staff member refrains from reciprocating, and the hand or arm isn't placed on any protected area of the staff member's body. Staff must otherwise, tactfully and sensitively explain to students that they cannot engage in physical contact with them.



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General Well-Being

The following applies to all students, however, staff need to consider the implications of the following to our adults at risk.

- All students should be dressed appropriately for school and should not wear any clothes that would offend anyone, e.g. clothes that are too revealing or T-shirts with offensive slogans or images. If you see anyone who is dressed inappropriately or is wearing something which may cause offence, please speak to them, or ask a member of staff of the same gender as the student to speak to them.
- While bullying is clearly against the school rules, staff should be particularly sensitive to the possibility of adults at risk being bullied. Ensure that all students treat others with respect and don't allow students to talk to one another in an inappropriate way even if they say it's just a joke or they don't really mean it.

One-to-one contact with students

Staff should:

- Not spend excessive amounts of time alone with any student away from others.
- In the event of having to meet with an individual make every effort to keep this meeting as open as possible.
- If privacy is needed, ensure that other staff are informed of the meeting and its location. For these meetings there should be two members of staff, one male and one female, present. Staff are strongly advised against meeting any student, especially of the opposite sex, alone in a closed space.

Whistleblowing

Staff are required to report to their line manager (or any senior manager) any instances where they are worried that a fellow member of staff may be engaging or may have engaged in any inappropriate or illegal activity with students. Confidentiality and support will be given to any staff member who raises such concerns.

Staff should also feel that they are able to raise concerns about potential failures in the school's Safeguarding procedures and know that the Senior Management Team will take such concerns seriously.

Procedure for reporting allegations or suspicions of abuse

Responsibility of staff to report

It is the duty of Project X staff to disclose cases of abuse or allegations of abuse to the Designated Safeguarding Lead without delay. It is NOT for staff to decide whether or not a suspicion or allegation is true. All suspicions or allegations of abuse must be taken seriously.

Further Action

Once a statement has been collected from a student further questioning should be avoided apart from important clarification of factual detail.



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A senior management representative and the Designated Safeguarding Lead will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student and consider any other relevant information.

The DSL will decide if it is appropriate to involve other members of the school staff, at this stage, and also whether to inform the student's agent and parents. There may be no need to take any further action in which case this decision should be recorded in writing.

Further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer or contacting the police.

ALWAYS REPORT ANY ALLEGATIONS, PROBLEMS, CONCERNS OR ISSUES TO THE DESIGNATED SAFEGUARDING LEAD (DSL), IMMEDIATELY. IN HIS ABSENCE REPORT THESE TO THE DESIGNATED SAFEGUARDING PERSON (DSP).

Sharing information

Good communication is essential in any organisation. At Project X every effort will be made to ensure that, should individuals have concerns, they will be listened to and taken seriously. The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 do not prevent staff from sharing information to the appropriate people if there is a need to safeguard and promote the welfare of those at risk of abuse or neglect.

Recognising Different Forms of Abuse

While abuse of young people at Project X may seem to be extremely unlikely we should not assume that it could never happen. Our duty of care to adults at risk extends to watching out for signs of potential abuse.

Here are some signs to look out for that may indicate an adult at risk is suffering from abuse. Some signs may vary with the age of the adult at risk. Not every adult at risk will exhibit every symptom. As well as signs, adults at risk may tell you of abuse. Always listen and follow the procedures for responding to allegations of abuse (below).

Types of abuse

Sexual abuse

Many young people who are victims of sexual abuse do not recognise themselves as such. Sexual abuse can have a long-term impact on mental health. Victims of sexual abuse can be male or female.

Signs to look out for:

- Acting in an inappropriate sexual way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy



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- Personality changes, seeming insecure
- Unaccountable fear/dread of particular places or people
- Changes in eating habits
- Physical signs such as unexplained soreness around genitals, sexually transmitted diseases
- Becoming secretive

Emotional abuse

Emotional abuse is persistent emotional maltreatment. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on emotional development.

Signs to look out for:

- Delayed physical or emotional development
- Shows extremes of passivity or aggression
- Sudden speech disorders
- Overreaction to mistakes, or continual self-depreciation
- Neurotic behaviour (rocking, hair twisting, self-mutilation)

Physical abuse

It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating.

Signs to look out for:

- Frequent injuries
- Unexplained or unusual fractures or broken bones, unexplained bruises, cuts, burns, scalds or bite marks
- Wearing clothes to cover injuries, even in hot weather.

Neglect

Neglect is a pattern of failing to provide for basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter.

Signs to look out for:

- Often hungry; may beg or steal food
- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed, hair not brushed
- Lacks needed medical or dental care
- Often tired
- Might abuse alcohol or other drugs



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Specific Areas

In addition to the types of abuse mentioned above, two other specific types of abuse that staff must be aware of are Peer-on-Peer Abuse (which includes bullying, cyberbullying, sexual violence and sexual harassment), and Honour-based Violence (HBV), which includes Female Genital Mutilation (FGM).

Peer-on-Peer Abuse

Peer-on-peer abuse can include bullying (including cyberbullying), sexual violence and sexual harassment.

Cyber-bullying

Cyberbullying is bullying that takes place over digital devices such as mobile phones, computers, and tablets. It can occur through text, and apps, or online in social media, forums, or gaming where people can view, participate in, or share content. Cyberbullying includes sending, posting, or sharing negative, harmful, false, or mean content about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour.

The most common places where cyberbullying occurs are:

Social Media, such as Facebook, Instagram, Snapchat, and Twitter

SMS (Short Message Service) also known as Text Messages sent through devices

Instant Message (via devices, email provider services, apps, and social media messaging features)

Email

Signs to look out for include:

- Appearing nervous when receiving a text, instant message or email;
- Unwillingness to share information about online activity;
- Unexplained anger or depression, especially after going online;
- Abruptly shutting off or walking away from the computer or mobile device mid-use.

Sexual violence and sexual harassment

Sexual violence is defined as any sexual act or attempt to obtain a sexual act by violence or coercion, acts to traffic a person or acts directed against a person's sexuality, regardless of the relationship to the victim.

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. It can include, but is not limited to:

- sexual comments, such as: telling stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;



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- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats.

Some people might try to excuse mild transgressions as a "joke". However, all forms of sexual violence are unacceptable. It should also be noted that both perpetrators and victims can be either male or female.

Honour Based Abuse (HBA)

This is coercion or violence used against a person in the belief that family or tribal honour requires action. A person can be seriously injured or even killed in extreme cases.

Signs to look out for include:

- The student being withdrawn, anxious or frightened.
- A decline in behaviour or performance.
- A family member keeping a close eye on the student.

Female Genital Mutilation

This is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL. Any suspected case of FGM must be reported to the police.

Differentiating between a concern and a serious issue

All serious issues and concerns must be reported to a member of the Designated Safeguarding Team. Serious issues, in which an adult at risk could be in immediate danger of harm or abuse must be acted upon immediately. If a member of staff has a concern about a student, even though that student may not be in immediate danger, they must still report that concern to a member of the Designated Safeguarding Team. Early intervention will reduce the risk of the situation becoming more serious if the concern proved to be justified.

Identifying Vulnerable Students

The Designated Safeguarding Team identifies students who may be vulnerable to harm or abuse through the sharing of information which may come from student bookings, comments from teachers and other staff members. Factors that may make a student vulnerable include special educational needs and disability. However, many factors could make a student vulnerable and all staff must report any concerns they may have to a member of the Designated Safeguarding Team.



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Record keeping

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in separate files in a locked room or in secure electronic files. Only the Designated Safeguarding Lead and Designated Safeguarding Person will have access to these files, and only when necessary.

The Records

In any case where an allegation is made, or someone in Project X has concerns, a record should be made. Details must include, as far as practical:

- Name of adult at risk
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and Address of parent/s or person/s with parental responsibility
- Telephone numbers if available
- Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details
- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has the adult at risk been spoken to?
- If so, what was said?
- Has any individual been identified in the allegation?
- If so, record details
- Who has this been passed on to, in order that appropriate action is taken?
- Has anyone else been consulted?
- If so, record details
- ACTION TAKEN: this must be recorded.

If an adult is accused

It is the duty of Project X staff to disclose cases of abuse or allegations of abuse to the Designated Safeguarding Lead or Designated Safeguarding Person without delay.

Procedure if the DSL or a senior manager is accused

If an accusation is made against the DSL the matter must be reported to a senior manager immediately. In the event that none of these are immediately on site, it should be reported to another member of the Designated Safeguarding Team who will follow the procedure outlined above.

If an accusation is made against a member of the Senior Management Team, the DSL will follow the same procedure, but keeping at least one other member of the Senior Management Team informed.



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Training

All staff receive training in basic safeguarding awareness and refresher training both face-to-face and online on an annual basis. The online training has a test component that helps to check that staff have understood the training before a certificate is generated. For face-to-face training, a short, written test is carried out immediately after the training and submitted to the trainer.

Members of the Designated Safeguarding Team are trained to the level of Specialist Safeguarding for the Designated Safeguarding Lead and this training is refreshed for the Designated Safeguarding Team every two years. J

Safer Recruitment

Project X is committed to safer recruitment. A position offered to a successful applicant is subject to references and a DBS check, or overseas equivalent. All applicants undergo a DBS check before they are in the post of employment. If an applicant has been working overseas then a local police check from the country or countries they have been working in for at least the past three years is required. Where a vacancy at Project X is advertised the school's commitment to safeguarding as well as our requirement that a candidate must undergo a DBS check is clearly stated in the advertisement. Candidates are also informed that any gaps in their work history must be explained satisfactorily. Questions at the interview stage of recruitment are designed to assess candidates' attitudes to the principle of Safeguarding. Employment of ex-offenders at Project X is possible provided that the seriousness, nature and frequency of the offence as well as the age of the conviction do not make the candidate unsuitable for the post they are applying for. Candidates are asked to disclose any previous convictions in a sealed envelope. At least two members of staff involved in the recruitment process will assess the candidate's suitability to work in the position they have applied for.

If a candidate has been working overseas before applying to Project X and the authorities of their country of residence refuse to provide a record check because they are not a national of that country Project X will request a DBS check for their UK records, if relevant, and will take additional care with the other recruitment checks – checking identity, qualifications, work history, and references. In such circumstances, the school will ask for three references rather than two.

Upon appointment, staff are required to undertake the online basic awareness in safeguarding training.

Staff Records

A single central record of staff is kept to maintain a record of all pre-appointment checks.

Use of Risk Assessments

A comprehensive range of Risk Assessments are carried out at least annually at Project X. Risk assessments generally fall into the following categories:

- The student residences
- On-site Social Programme activities
- Off-site Social Programme sports activities
- Off-site learning and social programme excursions



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Before engaging in any activity with students, teachers and Social Programme group leaders must read the relevant risk assessment and sign to say they have read and understood it. Staff must re-read and sign the risk assessment if an update has been made since they last read it or if six months have passed since they last read it.

The fact that an activity has been risk assessed does not mean that there are no risks to students. However, potential risks to students can be significantly reduced when staff follow safety provisions outlined in the risk assessment.

Safeguarding Adults at Risk on the Social Programme & Excursions

- All social programme leaders should be aware of the potential risks for the activity they are leading. All activity & excursion leaders must read the related risk assessment and instructions related to the Social Programme activity they are about to lead and sign the related document to declare they have read and understood them.
- For all social activities that take place within a controlled location, such as a sports hall, ensure that the room being used is fit for purpose, e.g. that all obstructions have been removed for Zumba and salsa classes so that there are no accidents.
- Sports activity leaders should ensure that students are playing their respective sports in a safe manner and should immediately calm students down if too much aggression is shown on the sports field.
- For all social programme activities, leaders must have a list of names of all students in their group and mobile phone numbers (where possible) of all students. These lists must be returned at the end of the event, and must never be left where anyone else may gain unauthorised access to them. They are therefore issued with a school mobile phone whenever they lead students on an off-site social programme activity. Students must also wear their school lanyards so they can be identified as being Project X students. In addition, leaders are issued with a rucksack containing the risk assessment for their particular activity as well as a suitable first aid kit.
- On excursions, students should be told to stay in groups of at least 3. All students should have a written copy of the group leader's mobile phone number to call in case of any problems and should be told to call the school emergency number.

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