

Safeguarding Policy

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Legal Status

This policy complies with Part 3, paragraphs 7 (a) and (b) of the Education (Independent School Standards) (England) Regulations 2014 and in force from the 5th January 2015.

Keeping Children Safe in Education (KCSIE) Information for all school and colleges (DfE: July 2015) incorporating statutory guidance, *Disqualification under the Childcare Act 2006* (February 2015) and also refers to non-statutory advice for practitioners,

What to do if you're worried a student is being abused (HM Government: March 2015)

Working Together to Safeguard Students (WT) A guide to inter-agency working to safeguard and promote the welfare of students (HM Government: 2015) which also refers to non-statutory advice, *Information sharing* HM Government: March 2015)

The policy is also consistent with any other relevant and current regulations issued by the government and any other guidance concerning Safeguarding Students to which schools are obliged to have regard.

Application

This policy applies to the whole College and all other activities provided by the College, inclusive of those outside of the normal study hours; all staff (teaching and support staff), contractors, supply staff, agency staff, students on placement, the Proprietors and volunteers working in MDA College. Although MDA College does not accept students under 18, it is important to safeguard young adults who are potentially vulnerable and away from home.

This policy has been compiled in conjunction with and reference to the following related documents which are available on the MDA College website and also on request from the Office; Anti-bullying; Designated Safeguarding Lead – Job Specification; First aid; Educational Visits and Off-site activities; Whistle blowing and Staff Code of Conduct.

Availability

This Policy is made available to staff, associates and students via the College's website and on request a copy may be obtained from the College's office.

Definition

Keeping Students Safe in Education (KCSIE) (DfE) July 2015 defines *Safeguarding* as, 'protecting students from maltreatment; preventing impairment of children's health or development; ensuring that students grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all students to have the best outcomes. Students include everyone under the age of 18.' All MDA, we have extended this to over 18s as a way of ensuring the safety and protection of our students, who come from very diverse backgrounds and may not be able to understand what is happening or what is acceptable in the UK.

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DSL and DSP

Designated Safeguarding Lead (DSL) and Designated Safeguarding Person (DSP) who are the Prevent Officer and Deputy Prevent Officer for the whole College have lead responsibility for student protection and are also the Prevent Officer and Deputy Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Both are members of the Senior Leadership Team (SLT) and have the status and authority within the academy to carry out the duties of the post. This includes student protection referrals, raising awareness, training, liaising with the local authority agencies as appropriate, committing resources and supporting and directing staff. Their telephone numbers are prominently displayed in MDA College. In all matters relating to student protection, MDA will follow the procedures laid down in this policy.

Monitoring and Review

This policy is subject to continuous monitoring, refinement and audit by the Operations Manager, Designated Safeguarding Lead (DSL), Welfare Officers and Designated Safeguarding Person (DSP). The management will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. This policy will be reviewed earlier if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Created: 18/02/2019

Last reviewed: 11/02/2022

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Signed:

A handwritten signature in blue ink, appearing to read 'Darren Smith'.

Darren Smith
CEO

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The role of the designated person (DSL and DSP)

DSL and DSP provide support to staff members to carry out their safeguarding duties. They also will liaise closely with other services. DSL and DSP, who are the members of the senior leadership team, have the lead responsibility for student protection.

Referrals

- Recognise signs of abuse and when to refer
- Understand the LADO role (Local Authority Designated Officer)
- Be a point of contact
- Liaison with head or principal
- Refer cases of dismissal or concern to DBS

Training

- Trained in basics, multi-agency working; and specifics of the role.
- Plan and deliver/commission/advise on safeguarding training during induction.
- Ensure that all staff has basic awareness training at least every 3 years.

Raising Awareness

- Ensure that the Safeguarding policy is updated and reviewed annually.
- Ensure staff familiarity and awareness of the policy, using meetings, briefings etc. to update awareness.
- Ensure that the policy is promoted and available to the public-explicit reference to safeguarding responsibilities
- Link with LSCB to ensure training and local policy updates are cascaded.
- Resources available <https://esat.nspcc.org.uk/about.aspx>

Designated Safeguarding Lead (DSL):

Darren Smith (CEO) is the Designated Safeguarding Lead (DSL) for MDA College. Contact details: mobile: 07447 774722 (24 Hours), Email: admin@mdacollege.com
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Designated Safeguarding Person (DSP):

Ali Smith is the Deputy Designated Safeguarding Lead (DDSL or DSP) for MDA College. Contact details: mobile: 07870582313 (24 Hours), Email: admin@mdacollege.com

The Local Authority Designated Officer (LADO)

The role ensures that all allegations or concerns about professionals or adults working or volunteering are recorded appropriately, monitored and progressed in a timely and confidential way. This is so students are protected from those who might harm them. It gives all agencies, whether from the statutory, private or voluntary sector, a central point of contact for them to discuss and make notifications falling within the above criteria.

All cases will be subject to an initial evaluation and where appropriate involvement of other sectors including the police, social care, employers and regulatory bodies. The initial evaluation will focus on the nature of the concern, safeguarding for the particular student and appropriate consideration for the member of staff/volunteer concerned. Inter-agency Allegations Management Meetings are also convened by the LADO to manage specific situations.

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Who Should Contact the LADO?

Anybody who has concerns about professionals or volunteers working with students should inform the LADO.

Where is the LADO based?

The Local Authority Designated Officer role is based at:
Integrated Safeguarding Unit
2 Great George Street
Leeds
LS2 8BA

Who are the Key Contacts?

Local Authority Designated Officers
Contact details: telephone: **0113 3789687** Monday to Friday between them they operate a duty system for LADO notifications, Email: **lado@leeds.gov.uk**

Urgent student protection concerns should be discussed directly

- 1.) Members of the public should contact Social Work Service on 0113 2224403 between 08:30 to 17:00.
- 2.) Professional people involved with the student or family should contact, Duty and Advice Team on 0113 3760336
- 3.) Enquires outside normal office hours, contact the Social Care Emergency Duty team on 0113 2409536
- 4.) Police: 999(For urgent action if a vulnerable adult is at immediate risk from any form of abuse)

Responding to allegations of abuse

The following procedures apply to all staff, including the part-time staff and volunteers.

In order to prevent any possible delay, all staff recognise that safeguarding is everyone's responsibility and know that they can make a referral to the DSL, DSP or the LADO directly if they wish. All unnecessary delays should be eradicated. In borderline cases, this can be done informally and without giving names in the first instance. MDA College will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police are informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the student/students.

The DSL will immediately, or at least within 24 hours, make a referral to the LADO Safeguarding Manager.

- If an allegation is made against anyone working at MDA College (inclusive of volunteers), the DSL must be informed and he will contact the LADO to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action.
- If an allegation is made against the DSL, DSP or Welfare Officer, then contact will be made by the Director of Study (DoS) to the LADO without contacting or notifying the DSL, DSP or Welfare Officers.

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- If the allegation is made against any proprietors, the MDA management will, without informing the proprietors in question, contact the LADO.

MDA College will carefully consider whether the circumstances of the case warrant suspension, or whether alternative arrangements should be put in place. MDA gives due weight to the views of the LADO and to the school policy when making a decision about suspension. MDA will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers. These restrictions apply up to the point where the accused person is charged with an offence. The National College for Teaching and Leadership (NCTL) publishes information about an investigation or decision in a disciplinary case.

Purpose

MDA College fully recognises its responsibility to safeguard and promote the welfare of students at the College. The purpose of this policy is to provide staff, volunteers and the proprietors with the guidance they need in order to keep students safe and secure in the College and to inform students (and guardians where applicable) how we will safeguard them whilst they are in our care.

Context

MDA College recognises that students and young people have a right to feel secure and cannot learn effectively unless they do so. People can harm students either by direct acts or failure to provide proper care, or both. Students may suffer neglect, emotional, physical or sexual abuse or a combination of such types of abuse. All students have a right to be protected from abuse. MDA College reserves the right to contact Social Care or the Police. Our students have the right to respect and protection from abuse, regardless of age, gender, religion, race, nationality, sexuality, culture or disability.

We are committed to creating an environment where staff feels able to raise concerns (in accordance with locally agreed inter-agency procedures) and to feel supported in their safeguarding role. *Keeping Students Safe in Education* (DfE: 2015) makes it clear that anybody may make a referral to external agencies, if necessary. While it would be more common for the Designated Safeguarding Lead (DSL) to make referrals to external agencies, it is most important that all adults understand that our threshold for taking action is not placed unnecessarily high; perhaps leading to a failure to react to borderline cases. Our safeguarding policy document gives advice on actions our staff should take when receiving a disclosure – including avoiding asking leading questions and explaining that confidentiality cannot be promised. Advice on the need to keep clear notes, and to reassess concerns where situations do not seem to be improving, to share information quickly, or where there is inaction, is included in this policy. Staff should also be familiar with the protections provided by the *Whistle Blowing Policy* (which is on the website) and the information contained in the *Code of Conduct*. In preparing this policy, we have been attentive to the nature, age range and other significant features of the College in the provisions made for safeguarding and to be aware of issues arising from anti-radicalisation.

Please consider this policy as in conjunction with the Anti-Bullying and Anti-Radicalisation Policies and also implicit in the rules of MDA College as a whole.

Aims

This policy, inclusive of the procedures, applies to all staff, the Proprietor and volunteers working at MDA. We work in full compliance with *Keeping Students Safe in Education* (DfE: July 2015) and

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Independent School Standards Regulations. The aim of MDA College procedures is to prevent students being abused and to safeguard and promote the welfare of students at the academy by:

- Raising awareness of student protection and safeguarding roles and responsibilities with Staff, and the Proprietors, and volunteers.
- Developing, implement and review procedures in our academy that enable all staff and volunteers to identify and report cases, or suspected cases, of abuse.
- Supporting students who have been abused in accordance with their agreed student protection plan.
- Differentiating between safeguarding students who have suffered or are likely to suffer significant harm 'students at risk' and those who are in need of additional support from one or more external agencies 'students in need.' The former will be reported immediately to the Safeguarding Managers (DSL or DSP); the latter will lead to inter-agency assessment using the Common Assessment Framework (CAF).
- Recognising our duties both to students in need and students at risk.
- Ensuring the practice of safe recruitment in checking and recording the suitability of staff and volunteers to work with students.
- Establishing a safe environment in which students can learn and develop.
- Ensuring that allegations or concerns against staff are dealt with in accordance with DfE and local guidance.
- The decision to seek support for a student in need, by the DSL, would normally be taken in consultation with the student.

Staff Responsibilities

MDA College will;

- Establish and maintain an environment where students feel secure, are encouraged to talk and are listened to.
- Ensure students know that there are staff in the College whom they can approach when they have concerns.
- Ensure policies and procedures are applied with due common sense and sensitivity.
- Treat all disclosures with the strictest confidence.
- Notify any guardian of our concerns, and provide them with opportunities to change the situation, where this does not place the student at greater risk.
- Develop effective links with the Safeguarding Manager and cooperate as required with their enquiries regarding student protection matters including attendance at Student Protection Case Conferences.
- Liaise with other agencies that support pupils through normal referral routes.
- Respect the right of students to differing opinions/beliefs, but not tolerate oppressive/anti-social behaviour.

Induction and On-Going Training for all staff, volunteers and the management

Induction training for all new employees (including temporary staff and volunteers) takes place either before or on the day the person starts at MDA College. This includes the identity and the function of the DSL, Safeguarding Policy and Procedures, Staff Code of Conduct and Teachers' Standards (including the whistle blowing procedure), and the Prevent Policy. MDA College ensures that sufficient relevant staff is trained in safer recruitment processes. Our induction training enables staff to identify signs of possible abuse and neglect at the earliest opportunity and to respond in a timely and appropriate way. Additionally, refresher training is undertaken for all every three years.

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Extremism, Prevent Duty and Promoting British Values

In the government guidance for England Keeping Children Safe in Education (DfE, 2016) radicalisation is defined as, 'the process by which a person comes to support terrorism and forms of extremism.' It covers all types of extremism, e.g. extreme right wing, animal rights, openness to other religions. Please see the Anti-Radicalisation Policy for more information.

Statutory guidance and advice

Schools in England and Wales have a duty under section 26 of the Counter-Terrorism and Security Act 2015 (HM Government, 2015) to identify vulnerable young people and prevent them from being drawn into terrorism.

The Prevent Duty guidance (HM Government, 2015) for schools in England and Wales was issued under section 29 of the Act and states specifically what action schools should take to prevent and respond to concerns about radicalisation. For schools in England it should be used alongside Keeping Children safe in Education (DfE, 2016).

What is MDA College required to do under the Prevent Duty?

The Prevent Duty guidance (HM Government, 2015) highlights that protecting young people from being drawn into terrorism should be part of a schools wider safeguarding responsibility and should be included in school policies. Other requirements for schools are summarised in four general themes in the Prevent Duty guidance:

- Risk assessment
- Working in partnership
- Staff training
- E-safety policies

Risk assessment

As stated in the Prevent Duty guidance (HM Government, 2015), risks of radicalisation of young people may vary from area to area. It is important that our academy understand these risks so they can respond in an appropriate way.

Channel Duty guidance (Home Office, 2015) provides a vulnerability framework that can be used to identify those who may at risk of becoming radicalised. It also provides a list of possible indicators, some of which include:

- A person changing their style of dress or personal appearance to accord with the group.
- A person's day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause.
- A person being in possession of material or symbols associated with an extremist cause.

Online radicalisation through social media and the Internet is a particular concern. The Home Office and DfE have published a briefing for schools in England 'The use of social media for online radicalisation' (2015).

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Working in partnership

As stated in the Prevent Duty guidance (HM Government, 2015) schools should follow the local safeguarding arrangements, policies and procedures of their Local Safeguarding Children Board (LSCB). The Home Office funds dedicated Prevent coordinators to work with communities and schools.

MDA College has partnerships with welfare organisations, social groups in Leeds and the West Yorkshire Police to promote student wellbeing, good mental health and positive social environments during their time in the UK. More information about these partnerships is available in our Welfare Policy. MDA sees these partnerships as crucial to creating a positive and stimulating environment with support for students who need it.

Staff training

The Prevent Duty guidance (HM Government, 2015) states school staff should attend training so they are aware of possible signs that a student may be at risk of becoming radicalised and clear on what action to take. The Home Office has developed a core training product for this purpose: *Workshop to Raise Awareness of Prevent (WRAP)* and there should be professionals within local authorities who are WRAP trained facilitators. Details of WRAP can be found in the Channel Duty guidance (Home Office, 2015) paragraphs 92-95. Channel also has a free online awareness course about extremism that may be useful for staff to complete.

E-safety policies

Three key aspects:

- Content – being exposed to illegal and harmful material.
- Contact – being the subject of harmful or hurtful interaction online.
- Conduct – own behaviour in the virtual world that increases risk.

The Prevent Duty guidance (HM Government, 2015) requires schools to ensure they have suitable Internet filtering software in place to block students from viewing extremist material. Internet safety should be integral to school ICT policy.

1. Prevent Duty

The Proprietors, managers and staff are fully aware of their duty of assessing the risk of students being drawn into terrorism and fundamentalism. It is incumbent on us to be vigilant in ensuring that our students are safe from extremist and terrorist material when accessing the Internet. Integral to our e-safety strategy is ensuring that appropriate filtering is in place. This is achieved through the curriculum, our management of e-safety, being aware of student behavioural changes, being alert to any attempted external influences on the academy and of course through staff training. Whilst we intend to access training recommended by the local authority, the training (on-line) opportunities through the *Channel Preventing Radicalisation* programme is to be accessed. MDA College promotes young people in making positive choices about their lives and endorses the Channel early intervention scheme for students who could be at risk of radicalisation. The on-line training for the Designated Safeguarding Officer and Deputy Safeguarding Officer is to be extended to all staff.

What MDA staff must know and do

If a member of staff has a concern that a student may be at risk of becoming radicalised, they should follow the school's normal safeguarding procedures and if necessary make the appropriate referral to Social Care, the Police or Channel as advised in the Prevent Duty guidance (HM Government, 2015).

The Department for Education (DfE) also has a dedicated telephone helpline for England for non-emergency concerns about extremism
020 7340 7264 – counter.extremism@education.gsi.gov.uk

Resources and links

College of Policing & Metropolitan Police Service (2014) Channel Training
DfE (2016) Keeping Children safe in Education
HM Government (2015) Prevent Duty
Home Office (2015) Channel Duty

Home Office, DfE, (2015) the use of social media for online radicalisation
NSPCC:0808 800 5000-help@nspcc.org.uk

2.) Promoting British Values

This is non-statutory advice from the Department for Education. Maintained schools have obligations under section 78 of the Education Act (2002), which requires promoting the spiritual, moral, cultural, mental and physical developments of pupils at the school and of society. British values are a set of five values introduced to help keep students safe and promote their welfare.

Democracy

- We are all involved in decision making
- We have a say in our learning environment
- We have a say in where we go and what we do

Mutual Respect

- Student of the Week, class rules, school rules, working relationships.
- Culture beliefs, celebrate Diwali, Chinese New Year, Shrove Tuesday, Mother's Day, Father's Day, St George's Day, Bonfire Night, Harvest Festival, Remembrance Day, Christmas Nativity and Eid
- We show respect to each other. We help each other.

Liberty

- We listen to the views of everyone
- We learn to understand the views of everyone
- We learn to give our own views in a fair way
- We make individual choices about where we work in the class

Tolerance

- We provide positive relationships

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- We promote tolerance of other cultures
- We share and take turns
- We help and support each other
- We wait for our turn when speaking to others

Rule of Law

- We understand the rules of our institution
- We decide the class rules
- We follow the rules to keep us safe
- We understand the rules to keep us safe during visits

Resources and links

Prevent Strategy

<https://www.gov.uk/government/publications/prevent-strategy-2011>

Teachers Standards

<https://www.gov.uk/government/publications/teachers-standards>

Equality Act 2010 Advice for Schools

<https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

Female Genital Mutilation (FGM)

FGM is a severe form of gender-based violence, and where it is carried out, it is an extreme form of abuse. Illegal since 1985 to perform, assist, or remove to country of origin. Countries of FGM are 28 North African countries, Middle East and Asia. MDA College, including teachers, has the most regular and on-going interaction with young people outside of their homes. They are in best position to detect the warning signs that a young woman may be at risk of FGM or of committing an FGM offence against a child. It is vital that MDA staff has an awareness of these indicators, and know when to refer the matter the social care and police.

Resources and links

If someone is in immediate danger contact the Police by dialling 999

If you are concerned that someone may be at risk, contact the NSPCC help line on 0800 028 3550 or email fgmhelp@nspcc.org.uk

Indicators of Abuse

A form of maltreatment of a young adult, somebody may abuse or neglect a young adult by inflicting harm, or by failing to act to prevent harm. Adults may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). There are main four categories of abuse and neglect. Neglect, emotional abuse, physical abuse and sexual abuse. Each has its own specific warning indicators, which should be alerted to; working towards safeguard (2015) statutory guidance sets out full description.

1.) Neglect

Although neglect is usually associated with under 18s, it can also occur in over 18s and adults who are not receiving adequate care from others. These others in the context of MDA can mean their

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own families, homestay, accommodation providers and other caregivers. The students in our care may not be used to living alone and may not be able to cope with these demands, even when they are over 18.

NSPCC research has highlighted the following examples of the neglect:

- Frequently going hungry; frequently having to go to school in dirty clothes.
- Regularly having to look after themselves.
- Not being taken to the doctor when ill and not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: students who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the student. The duty to safeguard and promote the welfare of students (*What to do if you are worried a student is being abused* 2006) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a student continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a student is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a student is being abused. Each student should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include:

- constant hunger and stealing food; poor personal hygiene – unkempt, dirty or smelly;
- being underweight; wearing dress unsuitable for weather; poor state of clothing;
- Illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include:

- constant tiredness; frequent absence from school or lateness; missing medical appointments;
- becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and
- Having destructive tendencies.

2.) Emotional Abuse

Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Students can be harmed by witnessing someone harming another person – as in domestic violence. It is sometimes possible to spot emotionally abusive behaviour towards students. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of Emotional Abuse

Developmental issues include:

- Delays in physical, mental and emotional development; poor educational performance and speech disorders, particularly sudden disorders or changes.

Behaviour:

- acceptance of punishment which appears excessive.
- over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc).
- neurotic behaviour (such as ricking, hair-twisting, thumb sucking); self-mutilation; suicide attempts.
- drug/solvent abuse; running away; compulsive stealing, scavenging.
- acting out; poor trust in significant adults; regressive behaviour – e.g. wetting.
- Eating disorders; destructive tendencies; neurotic behaviour; arriving early at school, leaving late.

Social issues:

- Withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses:

- extreme fear of new situations; inappropriate emotional responses to painful situations ("I deserve this").
- fear of family being contacted; self-disgust; low self-esteem; unusually fearful with others.
- Lack of concentration, restlessness, aimlessness; extremes of passivity or aggression.

3.) Physical Abuse

Most students collect cuts and bruises as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present. A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no student should be asked to remove clothing by a member of staff of the College.

Indicators of physical Abuse/Factors that should increase concern:

- multiple bruising or bruises and scratches (especially on the head and face);
- clusters of bruises – e.g. fingertip bruising (caused by being grasped);
- bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- bruises on the back, chest, buttocks, or on the inside of the thighs;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks;
- deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries;

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- recurrent injuries, burns or bald patches;
- having broken bones or unexplained bruising, burns or welts in different stages of healing;
- Being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.

In the social context of the College, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury;
- the explanation uses words or phrases that do not match the vocabulary of the student;
- no explanation is forthcoming; the student is secretive or evasive or
- The injury is accompanied by allegations of abuse or assault.

You should be concerned if the student or young person

- is reluctant to have family contacted; runs away or shows fear of going home;
- is aggressive towards themselves or others; flinches when approached or touched;
- wears long sleeves during hot weather if they do not usually cover themselves;
- has a fear of medical help or attention or
- Admits to a punishment that appears excessive.

4.) Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the student—e.g. relatives, family friends, neighbours, people working with the student, faith settings, clubs or activities. Anyone, including those over 18, can be victims of sexual abuse. Most people who sexually abuse students are men, but some women sexually abuse too.

Characteristics of student sexual abuse

- it is often planned and systematic – people do not sexually abuse students by accident, through sexual abuse can be opportunistic;
- grooming the student – people who abuse students take care to choose a vulnerable student and often spend time making them dependent;
- grooming the student's environment

Behavioural observations

- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness; Socially isolated or withdrawn
- Overly-compliant behaviour; Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults; Regressive behaviour
- Suicide attempts, self-mutilation, self-disgust

What our staff must know and do

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All cases of suspected student abuse should be given the highest priority. The following sequence of events should be adhered to. Where you think there might be reasonable grounds for suspecting abuse:

LISTEN to what the student has to say and take them seriously; reassure the student but advise that you cannot promise to keep a secret. If there is a requirement for immediate medical intervention, assistance should be called for.

RECORD in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the student and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure.

YOU MUST NOT INVESTIGATE THE INCIDENT, ASK LEADING QUESTIONS OR REPEATEDLY QUESTION/ASK THE STUDENT TO REPEAT THE DISCLOSURE OVER AND OVER.

- REPORT all suspicions, concerns, instances and allegations of actual or suspected student abuse or neglect immediately to our Designated Safeguarding Lead. In the absence of the DSL inform the Deputy DSL.
- REMEMBER – speed is essential - The SAFEGUARDING OFFICER will then provide advice, instruction and direction as irrelevant.

Responding to allegations of abuse

The following procedures apply to all staff, including the Directors and volunteers. In order to prevent any possible delay, all staff recognise that safeguarding is everyone's responsibility and know that they can make a referral to the SAFEGUARDING OFFICER or the LADO directly if they wish. All unnecessary delays should be eradicated. In borderline cases, this can be done informally and without giving names in the first instance. MDA College will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police are informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the student/students.

The DSL will immediately, or at least within 24 hours, make a referral to LADO;

- If an allegation is made against anyone working at MDA College (inclusive of volunteers), the DSO must be informed who will contact the LADO to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action.
- If an allegation is made against the DSL, then contact will be made by the other members of management to the LADO without contacting or notifying the DSL.
- If the allegation is made against the any proprietors, the other managers will, without informing the directors in question, contact the LADO.

MDA College will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. We give due weight to the views of the LADO and to our policy when making a decision about suspension. MDA will make every effort to maintain confidentiality and guard against publicity if there are allegations against teachers. These restrictions apply up to the point where the accused person is charged with an offence. The DfE/NCTL publishes information about an investigation or decision in a disciplinary case.

Domestic abuse

Domestic abuse refers to abuse that occurs within a domestic environment or a home. This includes but is not limited to:

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- Spousal abuse
- Child abuse
- Abuse of a vulnerable adult
- Abuse of a person living in that house
- Abuse of relatives

Domestic abuse includes:

- Physical violence, where a person is subjected to physical violence such as hitting, kicking, biting, scratching and so on.
- Emotional abuse, where a person's mental and emotional health is abused
- Coercive control, where a person is forced to do what another wants against their wishes
- Sexual abuse, including marital rape and FGM
- Slavery or forced work
- Forced marriage or incest

The signs of domestic abuse are similar to those catalogues before, but domestic abuse is statistically more likely to happen to women, although it can happen to men too. MDA staff must be aware that students who are reluctant to talk about their family are not necessarily being abused or abusing others, but that if this reluctance coincides with the other markers above, then there may be a reason to be suspicious.

MDA College commits to challenging the ideals behind domestic abuse, such as the abuse of women, and seeks to give a voice and empower our students to speak out against this kind of behaviour. MDA College will regularly deliver training to staff and students on what domestic abuse is and the rights of all people.

Any MDA staff or associates who suspect that a student is either subject to domestic abuse or is abusing another person must contact the DSL immediately. If you suspect that a crime is being committed now, please call the police on 999.

Hate incidents

MDA College is a Third Party Hate Incident Reporting Centre and trains its staff in recognising hate crimes and how to properly report these to the police.

MDA College is committed to working closely with West Yorkshire Police to investigate and prosecute anyone who commits a hate crime against any students or staff and also to cooperate with any investigations against staff or students if necessary. Disciplinary action may be taken against anyone found guilty of a hate crime.

Personal safety

All students receive a personal safety advice leaflet from West Yorkshire Police in their Welcome Pack. The police come in on a regular basis to speak to staff and students about how to stay safe in the UK.

Training on personal safety is key for MDA students, many of whom are from very different cultures and who may be away from home for the first time. MDA staff are to stay aware of any signs that students are engaging in risky behaviour and that they know who is in the College to support them.

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Missing Students

A student going missing from an educational setting is a potential indicator of abuse or neglect. Our staff will follow the College's procedures for dealing with students who go missing, particularly on repeated occasions. There could also be implications for such students regarding radicalisation and exposure to extremist views and possible terrorism. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation.

Use of phones and technology

In general, staff should not use mobile telephones in the presence of students. The recording of images of students by any means is a particularly sensitive subject and one which staff, volunteers and the Directors are made aware of for both the students' and their own safety. Any images or recordings should only be edited or stored on MDA computers unless with the express permission of the DSL. Personal mobile telephones should never be used for these purposes, and photographs or recordings should only be made where there is a legitimate MDA purpose. A student's privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the student involved. This guidance also applies to all students.

Allegations of abuse by one or more students on another student

In circumstances where there is an allegation of abuse by one or more students against another student, it is essential that all students involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse, where there is 'reasonable cause to suspect that a student is suffering or likely to suffer, significant harm' are that the allegation or disclosure must be reported to the DSL immediately, but at least within 24 hours of it becoming known. We will refer student-on-student abuse to an external safeguarding agency where there is a risk of significant harm. The DSL will report to the LADO as above.

Safer Recruitment and Employment of Staff and Single Central Record

Dealing with Allegations of Abuse against Teachers and Other Staff (2012) is a statutory guidance from the DfE. Schools, Local Authorities and FE colleges should have regard to it when carrying out duties relating to handling allegations against teachers and other staff.

At MDA College, we operate safe recruitment procedures, particularly pre-appointment checks on staff including Disclosure and Barring Service (DBS) checks, but also pre-appointment checks on volunteers, staff of contractors and other individuals that are not college staff or supply staff. MDA College follows the Government's recommendations for the safer recruitment and employment of staff that work with students. The Operations Manager receives Safer Recruitment training and manages all recruitment and volunteering in MDA College.

The *Single Central Register* (SCR), often referred to as the *Centralised Record*, is rigorously maintained. All employees and volunteers are checked in accordance with the full requirements of the SCR before starting work.

Contractors

Contractors (such as building and maintenance) engaged by or on behalf of MDA College and undertaking works on site will be made aware of this policy and expected to adhere to it. Their compliance will be monitored. Long-term contractors will be asked to provide their consent for DBS checks to be undertaken if a check is required for them coming into contact with students. Contractors

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for whom an appropriate DBS check has not been undertaken will be risk assessed and supervised if there is contact with students.

Visitors

Visitors are required to produce identity and to wear an MDA visitor identity badge. Unidentified visitors will be challenged by staff or reported to the Operations Manager.

Records

Written notes will be kept of all incidents relating to individual students. This information may be shared with other agencies; the views of the student who is the subject of the concern will be taken into account but staff will be alert to the dangers of keeping “secrets”. All contact with external agencies will be logged and kept in Student Welfare records which are kept separate from educational records and can only be accessed by designated people within MDA. The content of Student Welfare reports will be shared in advance of the meeting.

The detailed, accurate written records (inclusive of concerns and referrals) are kept and stored securely and separately from the main student file and use these records to assess the likelihood of risk. If a student is withdrawn from MDA, all efforts will be made to identify the school to which the student is being admitted; their confidential educational and student protection records will be sent separately. A student’s name will only be removed from MDA’s Admission Register in accordance with the Student Registration Regulations. MDA requires documentary identity proof of students presented for admission and if this gives cause for any doubt, advice will be sought from the local authority and other statutory agencies. We maintain accurate records of and emergency contacts.

Confidentiality

We regard all information relating to individual student or adult protection issues as confidential and we only pass information on to appropriate persons. Our staff listen to and support students but it must be made clear to the student that the person confided in must tell someone else so that the abuse can be dealt with. If the student then refuses to talk, staff should ensure that they talk.

Website Safeguarding Statement

To ensure the privacy and safety of students at MDA, only students’ first names are used. MDA College follows a policy of seeking permission before using images which show students on the website or in the local press. No private information about students is published on the website such as addresses or contact details.

Whistle blowing

Our Whistle Blowing Policy is integrated into training and Staff Handbook. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within MDA and to external agencies where necessary. This is one part of the way in which we establish in MDA, a positive safeguarding culture. We have a culture of safety and raising concerns. There are procedures for reporting, handling concerns and provision for mediation and dispute resolution where necessary.

Co-operation with the Local Authority

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We cooperate entirely with any investigation involving the LADO, in conjunction with the police. Our policy is in accordance with the guidance provided in KCSIE (DfE: July 2015) paragraphs 141 – 147. Therefore, suspension is not an automatic response and if immediate suspension is considered necessary, the rationale and justification for such a course of action is to be agreed and recorded by the DSO/Principal and the Directors, with advice having been taken from LADO. Suspension is not an indication of admission that the alleged incident has taken place but is to protect the staff member as well as students and families throughout the process.

Key Contacts

Ofsted: Piccadilly Gate, Store Street, Manchester, M1 2WD
Telephone: 03001234234
Email: enquiries@ofsted.gov - Website: www.ofsted.gov.uk

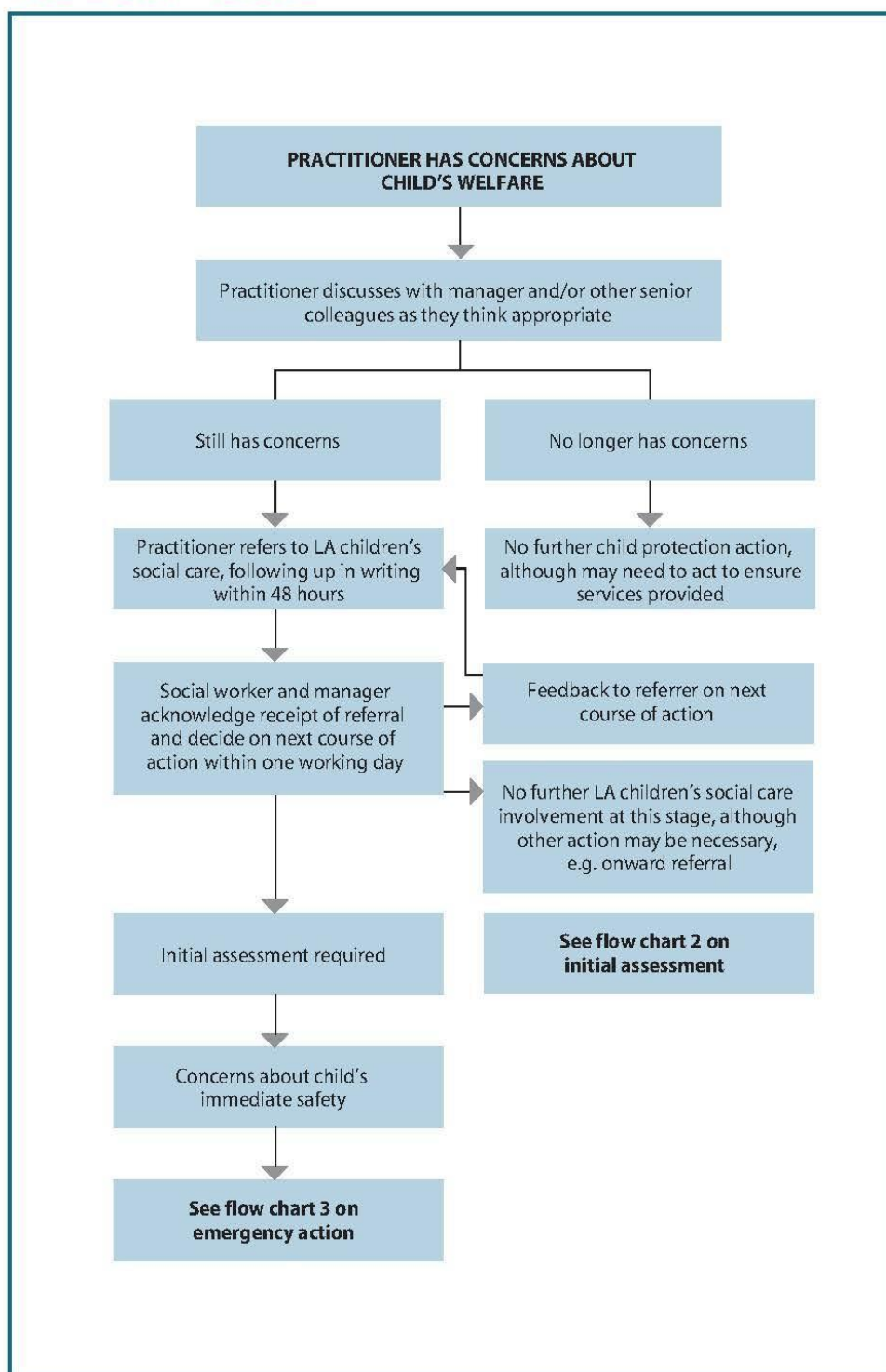
Independent Schools Inspectorate: CAP House, 9-12 Long Lane London, EC1A 9HA
Telephone: 0207 600 0100
Email: info@isi.net - Website: www.isi.net

Disclosure and Barring Service: PO Box 181, Darlington, DL1 9FA
Telephone: 01325 953 795
Email: customerservices@db.ssi.gov.uk

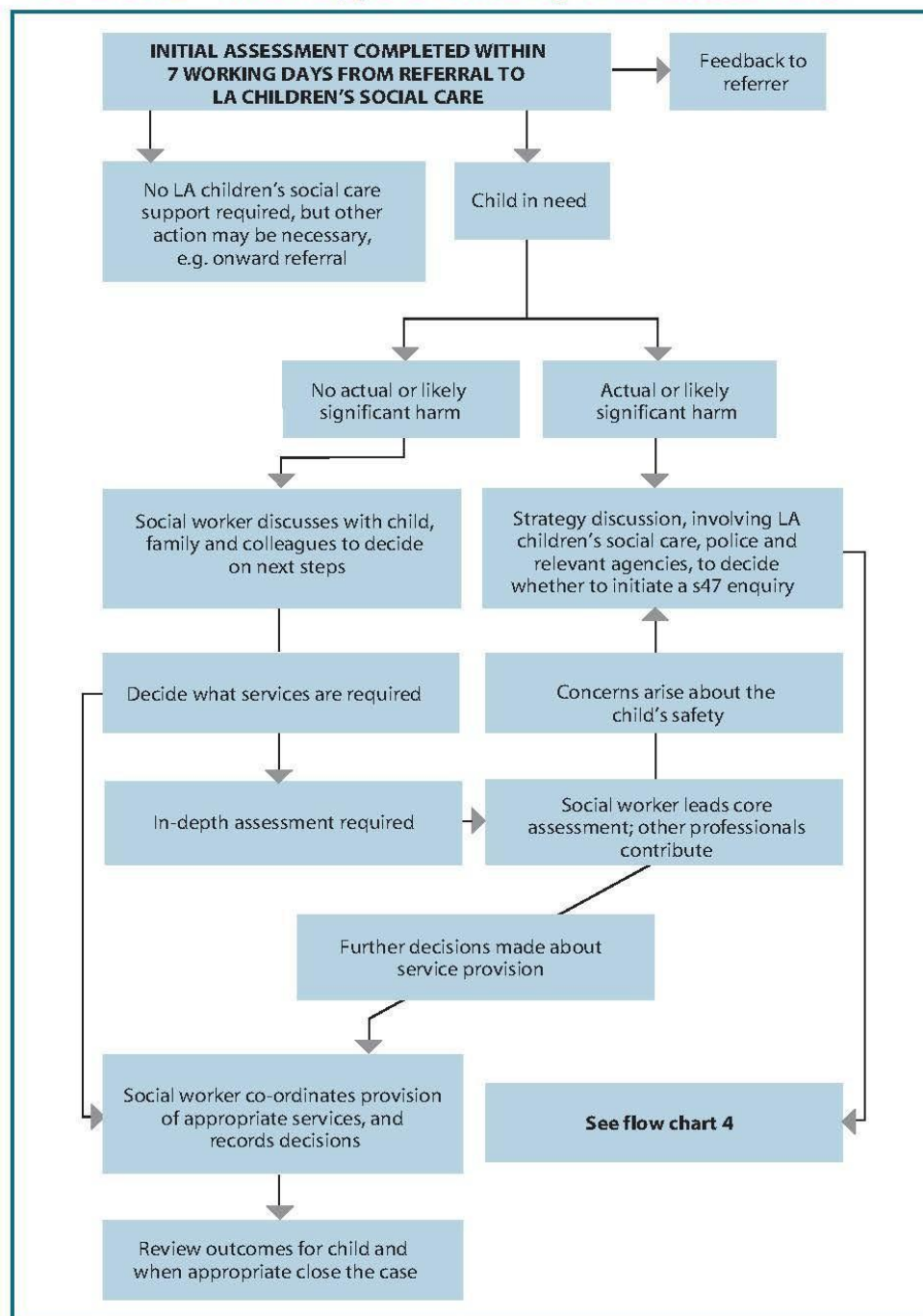
NSPCC Student Protection Helpline: 0808 800 5000
Student Line: 0800 1111 – Website: www.studentline.org.uk

Common Assessment/ Early help in Leeds (Integrated Processes team): 0113 245 6830

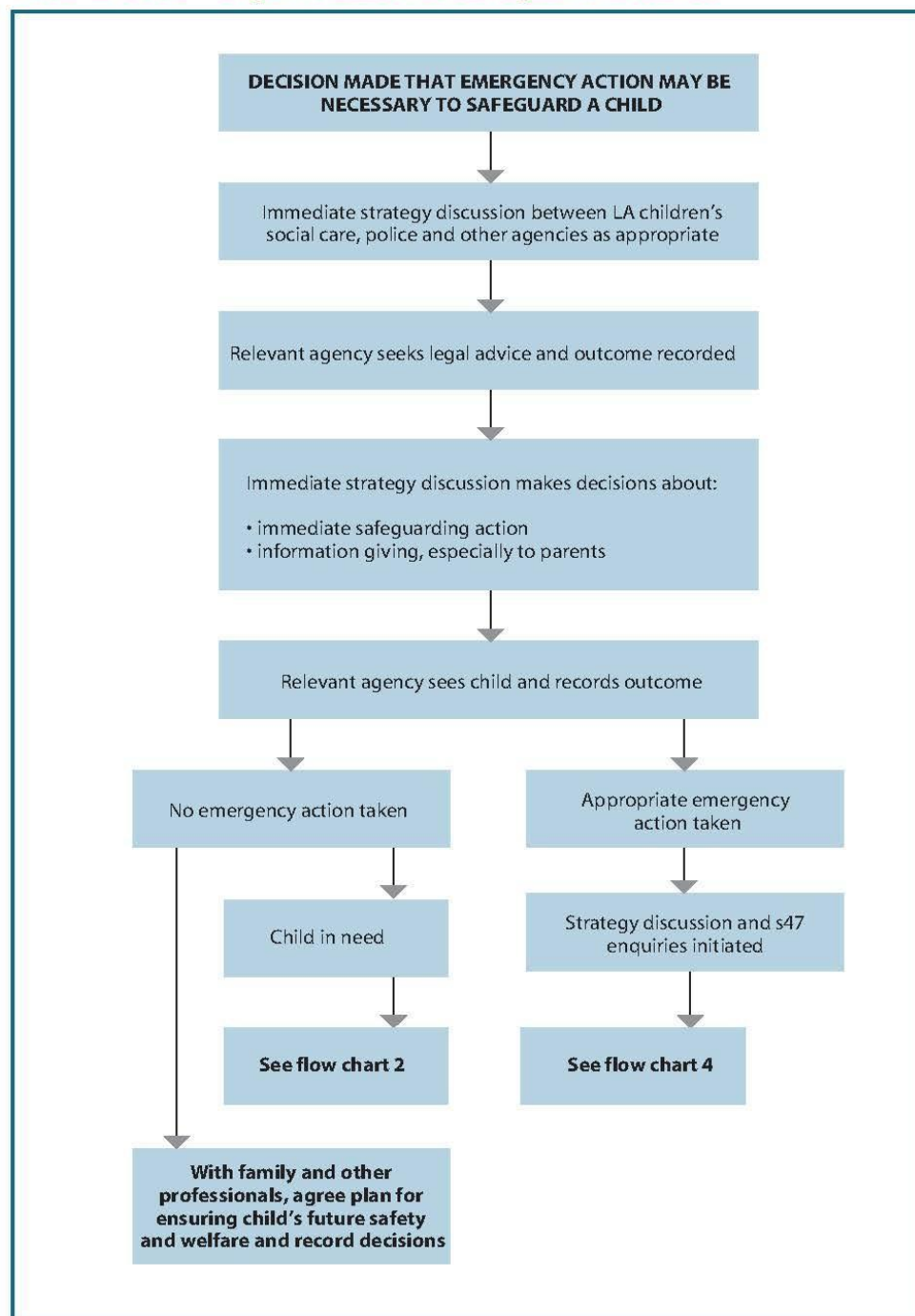
Flow chart 1 – Referral



Flow chart 2 – What happens following initial assessment?



Flow chart 3 – Urgent action to safeguard children



Disabilities Policy and Procedure

A disability is defined as “A person has a disability if they have physical or mental impairment that has substantial or long term adverse effects on their ability to carry out every day activities.” (Equality Act 2010).

At MDA College, we are committed to the safety and welfare of any disabled student in our school. We are committed to the abolition of unlawful abolition of discrimination of disabled persons as outlined in the Equality Act 2010.

MDA endeavours to accommodate disabled persons within our College in an appropriate manner, within the parameters of what we can realistically provide. These parameters are dictated by the size of the College, the facilities available, the members of staff and the practicality and cost-effectiveness of changes that can be made to accommodate students.

A full list of disabilities that MDA College cannot accept due to safety and welfare concerns is provided below. Any student who is found to have one of these conditions that was purposefully not disclosed during the application process may not be eligible for a refund of fees paid, especially where deception is involved. Where a student has not been aware of a disability or a new disability has come about suddenly and recently, MDA will endeavour to help that student to continue their studies and provide curtailment/refund advice on a case by case basis.

Procedures

Access to York House

Due to the nature of the building at York House, there are multiple stairs within the building and, although the bottom floor is accessible, it is not necessarily wheelchair accessible.

Students who cannot physically go around the building will not be to be accommodated into MDA, as their presence might cause issues during an emergency situation. A student that has a physical disability but is able to use these steps without help will be able to be accommodated into the College.

If a student who has applied from abroad is found to have a severe physical disability that would restrict their ability to exit the building that was not disclosed clearly during their application, MDA reserves the right to refuse them entry onto their course and, where appropriate, refuse refunds for any fees paid.

Access to external sites

MDA sometimes hire external sites for courses and bookings. In these cases, student enrolment will be based on the students' ability to access and safely exit that facility. For example, whilst York House is not wheelchair accessible, a prospective student in a wheelchair may be accepted onto the course if they can access the building where their course, provided that they meet all other criteria.

Visual/hearing disability

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Students with a visual and/or hearing disability require specialist aid in order to learn. This might be a dedicated learning assistant, specialist materials or/and significant changes to the syllabus of a course.

MDA reserves the right to refuse a student that they do not believe they can accommodate. This is to ensure that all students are adequately supported during their studies. MDA will evaluate each individual case on its own merit and, dependent on the severity of the impairment and availability of provision, will endeavour to include these students where possible.

Learning disabilities

MDA does not accept vulnerable adults, as these individuals require specialist care and provision that cannot be provided. MDA cannot allow individuals with these disabilities onto the premises. MDA can accept students with mild disabilities that will be able to function independently only.

If a student who has applied from abroad is found to have a learning disability that was not disclosed clearly during their application, MDA reserves the right to refuse them entry onto their course and, where appropriate, refuse refunds for any fees paid.

Students with disabilities

Students with disabilities attending courses at MDA must be treated equally and given the same opportunities as non-disabled students, whilst also having their particular needs recognised and taken into account. If there should be any situation in which a disabled student cannot access a service or activity, a full explanation must be given.

Students with non-visible disabilities should disclose their disability to the management, who will not repeat this information unless an emergency. The only exception is when the student wishes to disclose this information themselves.

Staff with disabilities

MDA is an equal opportunities employer and strives to make the College a friendly and suitable work environment for staff of all abilities. Staff members can expect the same procedural rules as students, except that they must disclose any disability upon employment to ensure their safety and care throughout their employment. Again, this will only be disclosed to others in an emergency.

MDA will not terminate employment of any disabled individual on the basis of their disability and will always endeavour to make suitable adjustments to ensure their continued employment in the academy.

List of Disabilities that MDA cannot safely accommodate

This list is not exhaustive, as MDA reserves the right to reject any students with additional needs based on a case by case assessment. This is to ensure that MDA can meet the needs of everyone involved.

- Angelman Syndrome (AS)

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- Severe Anxiety Disorders
- Aphasia
- Apraxia
- Severe Autism
- Auditory Processing Disorder (APD)
- Severe Emotional and Behavioural Difficulties (EBD)
- Borderline Personality Disorder (BPD)
- Severe Cerebellar Ataxia
- Severe Cerebral Palsy, where severe learning difficulties are also present
- Severe Epilepsy
- Fragile X Syndrome
- Profound or severe deafness
- Profound or severe blindness
- Deaf blindness
- Mowat-Wilson Syndrome
- Severe Multi-sensory impairment
- Severe muscular dystrophy
- Oppositional Defiant Disorder (ODD)
- Profound and Multiple Learning Disabilities (PMLD)
- Prader-Willi Syndrome
- Severe Learning Disabilities
- Severe Speech and Language Disorder
- Smith-Magenis Syndrome
- Severe Tourette's Syndrome
- Severe and chronic depression
- Severe ME (Chronic Fatigue Syndrome)

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- Williams Syndrome
- Severe Acquired Brain Injury (ABI)
- Paralysed limbs
- Severe mobility issues
- Severe bipolar disorder
- Severe eating disorder eg. anorexia nervosa or bulimia nervosa
- Schizophrenia
- Severe Obsessive Compulsive Disorder (OCD)
- Severe Post-Traumatic Stress Disorder (PTSD)
- Severe chronic illnesses

MDA College extra services

Minibus and transport

MDA College provides transport as an added extra service for students. Students who are on sponsorship bookings have this service included in their booking and other students will need to pay for this service to access it. All bookings for the minibus must be made to the Administrator before 4pm GMT the previous working day. No bookings can be made outside of UK office hours (9am- 5pm GMT). For information on terms and conditions of use, please speak to MDA management.

Students must respect the driver, the bus and those without bookings will not be allowed on the bus, regardless of space. The driver will wait for a maximum of 5 minutes at any location from the timetable before leaving. No refunds can be given if a student misses the bus due to lateness or late cancellation.

Childcare

MDA College does not provide childcare services. However, MDA College does partner with various local childcare providers and recommends their services to our students if asked. Although MDA College does visit an organisation and check their accreditations before officially partnering with them, MDA cannot be held responsible for an outside company or the service they provide. Students who have complaints about a childcare provider should talk to them directly.

Accommodation

MDA College works with outside agencies to help meet accommodation demands, and while we do check that these companies are professional and have good Health and Safety standards, MDA

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College cannot be responsible for the quality and safety of this accommodation. Please see the Accommodation Policy for more information.