



Safeguarding Policy

Introduction

1. Spurgeon's College is committed to ensuring that a safe and supportive environment exists for all students, staff and visitors to the College. The College recognises that there are a number of circumstances where children or adults at risk will come onto College premises or otherwise have contact with College staff or students in the course of their duties.
2. The College recognises its pastoral and legal responsibility to safeguard children and adults at risk who participate in any activity organised by the College or come into contact with College staff or students in the course of their duties, on or off campus.
3. The College recognises its legal duty to report suspected safeguarding concerns to relevant external agencies, regardless of whether the individual is a member of the College community, if that concern is reported to, or identified by, a member of staff or student in relation to the course of their duties.
4. This policy sets out how the College will deal with concerns that are raised regarding an individual who may be at risk of exploitation, harm or abuse (including radicalisation), and the type of action the College may take to manage such matters and provide support.

Legislation

5. In fulfilling these responsibilities the College will have regard to its obligations under relevant legislation, including:
 - The Health and Safety at Work Act (1974)
 - The Children Act (1989, 2004, 2006)
 - The Data Protection Act (1998)
 - The Safeguarding Vulnerable Groups Act (2006)
 - The Protections of Freedom Act (2012)
 - The Care Act (2014)
 - The Counter-terrorism and Security Act (2015).

Scope

6. This policy applies to safeguarding concerns regarding any registered student, staff member, contractor, third party agency, volunteer or visitor at Spurgeon's College.

7. It is designed to assist the College to take reasonable steps to safeguard those who are vulnerable by ensuring there are guidelines and procedures for identifying risk, reporting concerns and taking action.
8. The College has a Prevent Policy which sets out its duty to have 'due regard to the need to prevent people from being drawn into terrorism.'
9. Examples of where the College may have contact with children and adults at risk include:
 - Teaching, supervision and support of students
 - Admission of students under 18
 - Provision of pastoral services
 - Summer schools or school visits
 - Work experience
 - Apprenticeships
 - Outreach or widening participation activities taking place on or off College premises
 - Conferences or residential events
 - Student placements
 - Volunteering
 - Hire of College premises to external organisations.
10. This policy does not cover the College's general duty of care for staff and visitors. This is referenced in the College Health and Safety Policy and related documentation.

Responsibilities

11. The Safeguarding Committee is responsible for reviewing and updating this policy and any associated procedures. The Governors are responsible for appointing a Safeguarding Officer and a Deputy Safeguarding Officer and ensuring they are trained and competent in fulfilling their duties.
12. The role of Safeguarding Officer is undertaken by the Director for Practical Training and Admissions and the Deputy Safeguarding Officer is undertaken by the Director of Operations.
13. The responsibilities of the Safeguarding Officer include:
 - Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date;
 - Acting as a point of contact for those who have concerns, receiving information, recording information about concerns, risk assessing and taking action;
 - Acting upon concerns as appropriate in the circumstances, for example by making external referrals to Children or Adult Social Care, or the police;
 - Supporting and promoting the implementation of this policy and procedure.

14. Staff must undertake training as required, and refer to the Safeguarding Officer in the event they suspect or are concerned about a safeguarding matter.
15. Appendix 1 contains a statement of best practice when dealing with children or adults at risk. It lists some recommended behaviours for staff in terms of safeguarding.

Definitions

Child

16. For the purposes of this policy a child as a person who is under the age of 18.

Adults at risk

17. For the purposes of this policy, Spurgeon's College defines an adult at risk as:
 - an individual over the age of 18; and
 - who lacks the capacity to take care of him or herself (i.e. at risk of neglect); and/or
 - who may be unable to keep him or herself safe from the risk of significant harm, abuse or exploitation, including the risk of radicalisation or being drawn into terrorism.

Safeguarding

18. For the purposes of this policy, the term 'safeguarding' is used to refer to a number of areas of concern relating to children or adults at risk, including:
 - a) Child protection issues
 - b) (Sexual) exploitation
 - c) Radicalisation
 - d) Physical abuse or neglect
 - e) Emotional abuse or neglect.

Identifying safeguarding concerns

19. Examples of types of situations which may present a safeguarding concern and which may result in implementation of this procedure 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. Advice can also be sought from the College Safeguarding Officer:
 - A child or adult raises an allegation of current abuse, harm, neglect or other inappropriate behaviour;
 - 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;
 - 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.

- There are observable changes in an adult at risk or child's appearance or behaviour that may be related to exploitation, harm or abuse, including radicalisation.
 - 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 College will carry out a risk assessment and, if appropriate, invoke other appropriate policies, including disciplinary procedures;
 - 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;
 - A historic disclosure of sexual or physical abuse is made, where the perpetrator still has access to children or adults at risk.
20. The following incidents **MUST** always be reported to the Safeguarding Officer:
- If a child or adult at risk is accidentally hurt;
 - If there is concern that a relationship is developing with a child or adult at risk, which could represent an abuse of trust;
 - If there is concern that a child or adult at risk is becoming attracted to a student or staff member;
 - If there is concern that a colleague/peer is becoming attracted to a child or adult at risk;
 - If a child or adult at risk misunderstands or misinterprets something a staff member/student has done in a way which could be construed to be abusive or harmful;
 - 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;
 - If a child or adult at risk reports an allegation of abuse regarding a member of an external organisation using College facilities;
 - If a child or adult at risk reports concerns regarding a forced marriage or FGM.
21. The indicators of abuse or harm can be difficult to recognise. Further guidance on the types, signs and indicators of abuse is given in Appendix 2.

Reporting a safeguarding concern

22. PLEASE NOTE: *It is not the responsibility of the College to decide whether a person has been abused, but to raise concerns with appropriate services. The duty to **investigate** suspected abuse or harm rests with statutory services; primarily Social Care Services and the Police.*
23. Staff or students who become aware of a safeguarding matter, whether from a victim or from a third party, should follow the procedure as outlined in Appendix 3.
24. If an individual makes a disclosure:

- a) Listen carefully and stay calm;
 - b) Reassure the individual that what they have reported will be dealt with;
 - c) Keep questions to an absolute minimum, do not interrogate the individual.
Use open questions to clarify or to explore any immediate health and safety concerns;
 - d) Explain to the individual that you will need to report the matter to the College Safeguarding Officer and explain the College's internal process as outlined in Appendix 3;
 - e) Make a full record of what was said and what you have done as a result.
This should be done by completing Section 1 of the 'Safeguarding Concerns Reporting Form' included as Appendix 4 of this policy;
 - f) Report the matter immediately to the Safeguarding Officer (details included in section 12).
25. If a student or staff member has an **immediate and significant** concern for a child or adult's **immediate safety**, they may refer the matter directly to the Police or Social Care Services. After they have done so they should report the incident to the Safeguarding Officer using the Safeguarding Concerns Reporting Form included in Appendix 4.
26. Further advice on the 'do's and don'ts' following a disclosure are contained in Appendix 5.
27. Before referring to Social Care Services, the Police or any other external agency, the College's Safeguarding Officer will undertake a risk assessment and complete Section 2 of the Safeguarding Concerns Reporting Form. The Safeguarding Officer should:
- a) Address any serious and immediate risk to the child, adult at risk or any other party;
 - b) Preserve any evidence likely to be lost before external agencies can respond;
 - c) Determine the appropriateness of a referral to Social Care Services, the Police or another appropriate agency and provide sufficient information to the relevant external agency to enable an effective response;
 - d) Determine any further College procedures which should be invoked;
 - e) Identify any internal support required by the child or adult at risk.
28. If a referral to an external agency is deemed appropriate the Safeguarding Officer or their nominee will make the referral (contact details in section X). Referrals to external agencies may also include the Baptist Union or other professional bodies.
29. If a member of staff wishes to discuss a potential referral before completing the form they may contact the Safeguarding Officer and discuss the referral in principle without providing any names or identifying details.

30. Where the suspected abuse is alleged to have been carried out by a staff member, the College will work alongside external agencies during any investigations. If necessary, the appropriate disciplinary procedures may be invoked.

Students on placements

31. Students in a placement or professional work experience setting should familiarise themselves with the safeguarding policy of the organisation/ employer. They should normally report any safeguarding concern to the organisation/employer's designated safeguarding lead, as per the policy. If this is inappropriate, or if an appropriate response is not received from the organisation/employer, the safeguarding concern may also be reported to one of the College Safeguarding Officers as per the procedure set out above.

Admission of students under the age of 18

32. Suitability of a person under 18 for admission is determined by the Admissions team. For most courses, Spurgeon's College will not normally admit students under the age of 18.
33. Where the College does admit students under the age of 18, it acknowledges that it will have an enhanced duty towards these individuals as they are children. The following steps will be taken to ensure that the College meets its obligations to safeguard students under the age of 18:
- The College will require the student's parent/guardian to sign a consent form confirming that they have understood that the College is not *in loco parentis*;
 - The College will ensure that it holds a list of the student's emergency contact details, in particular those of parents/guardians;
 - The College will assign all under 18 students a personal 'tutor'. The staff member will have an appropriate DBS disclosure and will be made aware of the College's Safeguarding Policy;
 - Personal Tutors should make themselves known to the student at induction and meet with the student regularly to ensure that if the student has any difficulties, these are resolved as soon as possible;
 - The College will ensure that a DBS disclosure has been obtained for anyone who the College considers will have close, unsupervised contact with the student;
 - The College will not normally allow students under the age of 18 to live in College accommodation.
 - The College will undertake any relevant additional risk assessments with regard to accommodating children on College premises e.g. health and safety; and will ensure the College insurers have been adequately informed.

Disclosure and Barring Service (DBS)

34. The College 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 risk, will have an appropriate DBS check carried out. This

will usually be an enhanced check. Responsibility for ensuring such checks are conducted rests with the Director of Practical Training and Admissions.

35. Ministerial students are required to have an enhanced DBS check as a matter of course.
36. The procedure for carrying out DBS checks is outlined in the College Guidance on Criminal records and the Disclosure and Barring Service (DBS).

External organisations use of College facilities

37. A number of College facilities may be hired by external organisations for use in events involving children or adults at risk. In such cases the College has no control over, and assumes no liability for, the conduct of individuals from these organisations. However, the College wishes to ensure that safeguarding risks are mitigated as far as possible for such external events.
38. All external organisations requesting the use of facilities for activities involving children or adults at risk will be asked to confirm (on the application form) that they have a safeguarding policy in place and obtained appropriate checks on their staff and volunteers. The College will request sight of this policy.
39. Organisations without the appropriate policies and checks may not be permitted to hire College facilities.

Record keeping and confidentiality

40. The Safeguarding Officer will be responsible for ensuring that a full record is kept of the reporting process and of any action taken subsequently. This will be done in accordance with the College Data Protection Policy.
41. Matters arising at the Safeguarding Committee will be kept confidential unless disclosure is necessary in order to comply with the law, is in the public interest or consent has been given from the parties concerned.
42. Written record of any safeguarding concerns will be retained for as long as is necessary for the purpose it was obtained or as legally required or permitted. Such records will be held centrally by the Director of Operations and separately from staff or students personal records.

Training & support

43. The College will ensure that all staff are made aware of this policy.
44. Staff and students whose roles include regular contact with children and adults at risk will receive information and advice on safeguarding issues as appropriate to their role.

45. Ministerial students receive level 2 and 3 safeguarding training as part of their course. Appropriate safeguarding restrictions will be in place for any ministerial students that have not completed the training.
46. Staff working with students/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 external services.
47. Appropriate support will be made available for staff who receive disclosures of safeguarding issues.

Monitoring and review

48. The Safeguarding Committee is responsible for the review and updating of this policy and any associated procedures.
49. The Committee will provide an anonymised annual report to the Governors to identify any trends or patterns which may be of concern. The Governors will then determine any action which needs to be taken.

Contacts

College Safeguarding Officer

Linda Campbell (Director of Practical Training and Admissions)
l.campbell@spurgeons.ac.uk 020 8653 0850 x 219

College Deputy Safeguarding Officer

Helen Stokley (Director of Operations)
h.stokley@spurgeons.ac.uk 020 8653 0850 x 203

Croydon Police

For emergencies call 999 or otherwise call 101
Address: 71 Park Lane, Croydon, CR9 1BP

Croydon Council Adult Services

Adult Abuse Reporting Line: 020 8726 6500 Out of hours: 020 8726 6500
Email: referral.team2@croydon.gov.uk
Address: Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA

Croydon Council Children's Services

Urgent child protection matters needing immediate attention Tel: 0208 255 2888

This will connect you to the Single Point of Contact team and after some basic details are taken from you, you will be transferred to a social worker who will discuss the concerns with you and if necessary start child protection processes. This line is

for **urgent child protection matters only** that require a same day intervention from a social worker.

The emergency social work service is for urgent child protection matters that cannot wait until the next working day **Tel: 0208 726 6400**

Ask to speak to the out of hours team. You will be put through to an operator who will take basic information and then pass this on to the Single Point of Contact or the Out of Hours team.

Non-urgent referrals: phone the Contact Centre on 0208 726 6400

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Quality Code consulted			
Member of staff responsible	Director of Operations		

Appendix 1 Best practice when dealing with children or adults at risk

- I. The College expects all of its College staff, students, volunteers and contractors while carrying out their duties on behalf of the College to act in an exemplary manner towards children and adults at risk and to ensure that their behaviour does not give rise, whether rightly or wrongly, to questions about their integrity or to allegations of abuse. While not representing an exhaustive list, this statement sets out general expectations of behaviour in the course of their duties in terms of what may be regarded as appropriate and what may be regarded as inappropriate.

- II. College staff and students are referred to as 'College representatives' throughout this statement.

College representatives shall:

- Treat all individuals equally and with dignity regardless of age, disability, gender, marital status, race, religion/belief, or sexual orientation;
- Ensure welfare of the students (or subjects of the activity) always comes first regardless of the aims of the activity being carried out;
- Keep relationship on a professional footing, avoiding personal social contact. Try to separate personal and professional use of social media. Failure to do so may leave a staff member open to charges of bias;
- Ensure your dress and appearance are appropriate to your role, i.e. dress decently, safely and appropriately for the tasks you undertake and avoid clothing that is likely to be viewed as offensive (e.g. containing political or otherwise contentious slogans);
- Ensure that any accidents involving individuals (whether children or adults) in their care are reported in accordance with College procedure (or other relevant organisation);
- Be aware of and comply with the Safeguarding Policy and the Consensual Relationships Policy. In particular "Under the Sexual Offences Act 2003 it is an offence for anyone over the age of 18 working with young people (for example teachers, student mentors, academic staff etc.) to have a sexual relationship with a young person under the age of 18 who is in full time education".

College representatives shall avoid:

- Working alone with a child or adult at risk. Always arrange for another adult to be present or be in an open or overlooked area or alternatively notify another member of staff and ensure he or she is nearby. This includes offering lifts to a child.
- Entering children's rooms (bedrooms or changing rooms) unless it is essential. Staff should take particular care and be aware of the child/children's right to safety, privacy and decency.
- Taking advantage of the position of trust that you are in as a staff member (in relation to any students).

- Behaving in any manner that would leave any responsible person to question your suitability to work with children or adults a risk.
- Physical contact that could be open to misinterpretation by the child or a third party. Even when applying first aid staff should use discretion to ensure contact is necessary and appropriate.
- Conferring special attention and favour upon a particular individual or group of students or act in a manner that could be open to misinterpretation.
- Using or allowing others to use over familiar or sexually suggestive comments, inappropriate language or behaviour.

Appendix 2

Types, signs and indicators of abuse

- I. The following are types of abuse or harm which children or adults at risk may encounter (this list is not exhaustive):
 - a) **Emotional / Psychological:** persistent action or inaction by others that causes mental anguish or severe adverse effects on a child's or adult's emotional development. This can include "grooming" to draw or encourage people towards particular actions or extreme views – it isn't solely about drawing a person into sexual activity. Getting someone else to do something illegal is a form of harm and exploitation.
 - b) **Physical:** any intentional physical contact that results in discomfort, pain or injury including a parent or carer fabricating symptoms or deliberately inducing illness to a child or adult.
 - c) **Sexual:** including any form of sexual activity with an adult at risk or child under the age of consent or coercion or forced to take part in sexual acts including non-contact abuse or being forced to watch inappropriate images and the use of the internet/ technology.
 - d) **Neglect:** Failure to identify and / or meet care needs or adequate supervision.
 - e) **Institutional:** maltreatment of a person from a system of power.
 - f) **Financial:** Usually associated with the control or misuse of money, valuables or property. This could also include generous gifts or clothing to make a person feel indebted or that they 'owe' the giftgiver.
 - g) **Discriminatory abuse:** including racist, sexist, ageist, homophobic abuse or based on a person's disability, and other forms of harassment, slurs or similar treatment. This can include negatively influencing a person's views and actions against a group or part of society. If you become aware of bullying and harassment against someone who is not defined as vulnerable/at risk then this should be reported so it can be dealt with under alternate procedures e.g. Harassment and Bullying.
 - h) **Internet/electronic abuse:** the use of modern communication technologies (e.g. internet, text or video messaging, e-mail, chatrooms, social media such as snapchat or Instagram) to embarrass, humiliate, threaten, intimidate or bully an individual in an attempt to gain power and control over them or to influence towards particular views about people or society. Often closely linked with child sexual exploitation and the posting of illegal images but can be relevant generally to 'grooming' or drawing people towards extreme views or actions.

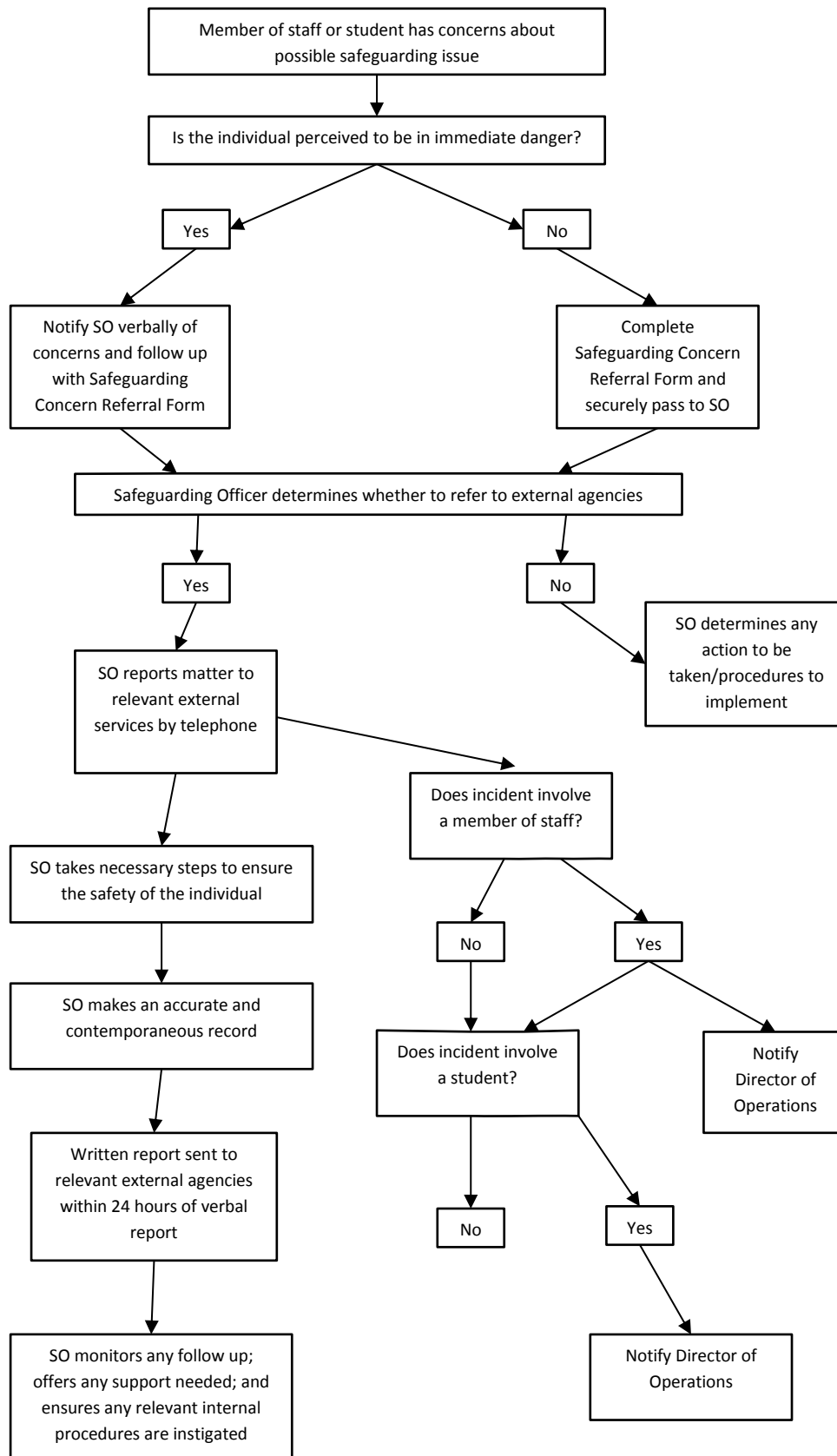
- II. It is important to note that harm, abuse or exploitation is a violation of an individual's human and civil rights by any other person or persons. It can:
- Consist of a single act or repeated acts or multiples types of harm;
 - Be intentional or unintentional or result from a lack of knowledge;
 - Be an act of neglect, an omission or a failure to act;
 - Cause harm temporarily or over a period of time;
 - Involve taking advantage of existing vulnerabilities and needs that a person has: people in need of identity, friendship or care, who are frustrated, lost or feel they don't fit in;
 - Involve manipulating or 'grooming' someone to get benefit or advantage or to make the person do something illegal or manipulating or dehumanising emotions to see others as outsiders and non-human – justifying actions – "they deserve it";
 - Occur in any relationship; or be perpetrated by anyone, individually or as part of a group or organisation;
 - Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on computer equipment.

Indicators of abuse

- III. It is important to recognise that this section describes *potential* signs and indicators of harm/abuse.
- IV. You may become aware of harm or abuse if:
- You see or hear something
 - Someone describes abuse to you that they or someone else is experiencing or is worried about
 - You notice injuries or physical signs that cause you concern
 - You notice a change in behaviour that concerns you and may indicate something may be wrong.
- V. The clearest sign of abuse is an actual report or direct statement. If someone confides in you, you have a responsibility to respond to the disclosure regardless of the nature of the relationship you have with the person in question.
- VI. Your role is never to decide whether there is enough evidence or if the allegation is supported by evidence, this responsibility rests with social services or the police. Your **only** responsibility is to report and/or discuss your concern with the Safeguarding Officer.
- VII. Signs of abuse are not always obvious and a person may not tell anybody what is happening to them, nor may they necessarily know that what is happening is abuse.

- VIII. Signs may be physical, behavioural or both.
- IX. The following may indicate that harm is taking place:
- Neglected or under-nourished appearance
 - Deterioration in appearance and/or mood
 - Being isolated or withdrawn
 - Unexplained bruising, fractures, burns, pain or marks on the body
 - Not wanting to be touched
 - Unexplained or inappropriate covering up
 - Deterioration in social engagement, accompanied by an increase in fearfulness
 - Using sexually explicit language or gestures or over sexualised behaviour
 - Using aggressive or violent gestures or being violent to others
 - Non or poor attendance, unexplained change in standard of work.
- X. Some of the above signs may just indicate that an individual needs some support. Please be aware of the College's pastoral support system or of external services which may be able to assist in a given situation.

Appendix 3 Procedure for reporting a safeguarding concern



Appendix 4

Safeguarding Concern Referral Form

Use this form to outline your concern. If you cannot complete a section, or feel a section is not relevant, leave it blank. The Safeguarding Officer will treat your disclosure sensitively. If you prefer not to complete this form, please phone the Safeguarding Officer.

Please remember it is essential to raise all concerns, however unsure you are. It is not the job of the College to investigate but to allow trained professionals to intervene and safeguard those at risk if necessary.

Section 1: To be completed by the person making the referral	
Name of the person you are worried about (if known):	
Name(s) of anyone else involved (if known), e.g. any witnesses	
Date of birth or age of person:	Gender:
Description of the safeguarding issue. This may include a factual account of something you have witnessed or an account of something a third party has reported to you.	
Any relevant dates, times and locations of the incident/s or when you became concerned:	
Any other observations or information:	
Any action you have taken already or anyone else you have spoken to:	
Name & position of person completing form:	Date concern reported:

Section 2: To be completed by the Safeguarding Officer		
Is the individual who is the subject of the concern at immediate risk? YES / NO Details:		
Does the incident relate to an allegation about a student or member of staff? YES / NO Details:		
Should the student or staff member be referred to the Operations Director for consideration of a precautionary suspension? YES / NO Reason:		
Does the reported incident require referral to a local safeguarding team? YES / NO Reason:		
Does the reported incident constitute a criminal offence requiring referral to the policy? YES / NO Reason:		
Actions to be undertaken (tick all that apply):		Date completed
No further action		
Referral to HR/Operations for consideration for precautionary suspension		
Referral to alternative/additional College policy/procedure e.g. disciplinary		
Report matter to local safeguarding team		
Report matter to the police		
Referral to other external or professional body e.g. BU		
Name of Safeguarding Officer completing form	Signature	Date

Appendix 5 Advice on reacting to suspicions and disclosures

If someone discloses that they are experiencing harm or abuse, or if there are suspicions that someone is at risk of harm or abuse, consider the following guidance:

Do	Don't
Be supportive.	Panic
Take what the child or adult at risk says seriously.	Delay
Give them time to say what they want to.	Promise confidentiality or that everything will be ok – it may not be.
Remain calm.	Ask them to repeat the story unnecessarily.
Reassure them that it was right to tell someone.	Express any of your own opinions, make assumptions, paraphrase or offer alternative explanations.
Explain what will happen next.	Ask closed questions or repeatedly question the individual.
Write down word-for-word immediately afterwards what was observed or said, including the time, place, and any other observations. Keep to the facts: sign, and record the date and time.	Discuss with anyone else what was told to you, other than with the Safeguarding Officer and / or the Deputy Safeguarding Officer.
Ask the individual to clarify anything you might have misunderstood.	Start to investigate or deal with the matter yourself.
Pass the referral to the Safeguarding Officer or Deputy Safeguarding Officer.	Contact the alleged abuser or other people mentioned/involved.

When making a written statement:

- Handwrite if possible and use black ink;
- Set out the sequence of events in a time ordered way if possible, stating only what your involvement was;
- Cross out and initial any mistakes/alterations rather than covering them up;
- State any background information you may think will help others understand what occurred e.g. the victim had behaviour which was challenging; how many staff were present etc;
- Number any additional pages used;
- When referring to a person identify them with their full name and designation.