

the great out-tours

inspiring people in the countryside

Safeguarding Policy

Approved by JR Brooksbank – Managing Director, 2011

Policy document date: January 2019



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The Great Out-tours Safeguarding Policy

1. Introduction

1.1 The Great Out-tours has a moral duty to safeguard the welfare of all its clients and an employer's duty to safeguard the welfare of its employees. These duties are reinforced by specific statutory duties on The Great Out-tours in respect of the safeguarding of children (that is young people under 18 years old) and vulnerable adults.

2. General Policy Framework

2.1 The Great Out-tour's overarching policy is to maintain the ethos of a small, friendly, well-ordered, and secure community where the physical safety of our students, staff and visitors is paramount, where all students and staff feel safe, where the health and welfare of all our learners is actively promoted, and they are appropriately protected from abuse according to their vulnerability.

2.2 This overarching policy is reflected in a large number of detailed policies which address particular aspects of safeguarding or aspects which relate to particular groups of students (or staff). They include the Child Protection Policy (Appendix A) & Protection of Vulnerable Adults Policy (Appendix B).

2.3 Taken together these policies and the procedures they contain are the primary vehicle by which The Great Out-tours fulfils its obligation to raise awareness of student welfare, aid the identification of students at risk of significant harm, establish procedures for reporting and dealing with allegations of abuse against members of staff, and ensure the safe recruitment of staff.

2.4 Every member of staff has a responsibility to ensure they are fully aware of these policies and to immediately report any safeguarding concerns that arise.

3. Statutory and Regulatory Framework

3.1 The main statutory and regulatory duties in respect of safeguarding arise from the following legislation:

- The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. The Act requires The Great Out-tours to assist the local authority on child protection issues.

Safeguarding Policy – General Statement

- Section 175 of the Education Act 2002 places a duty on FE governing bodies to have arrangements in place to ensure that they safeguard and promote the welfare of children receiving education or training at The Great Out-tours, and requires governing bodies to have regard to guidance issued by the Secretary of State from time to time.

The main guidance under the 2002 Act is

- i 'Safeguarding Children in Education' (September 2004) requires Corporations to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It therefore encompasses wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children, and underpins our common law duty of care.
- ii 'Safeguarding Children and Safer Recruitment in Education' (January 2007) partly replaces and extends 'Safeguarding Children in Education'. It provides more specific guidance relating to the recruitment and vetting of staff.

- The Safeguarding Vulnerable Groups Act 2006 places a duty on the Corporation to safeguard the health and well-being of vulnerable adults as well as children.

- 'Safer Practice Safer Learning' was produced by NIACE in 2007. This recommends creating a safer learning environment that promotes well-being and security, essential for all learners and all staff.

3.2 Regulatory oversight of the safety of The Great Out-tours employees lies primarily with the Health and Safety Executive.

3.3 The Great Out-tours recognises the need to work with other agencies in fulfilling its duties under statute and statutory guidance.

4. Procedures for the Protection of Children & Vulnerable Adults

4.1 A procedure for the protection of children is provided at Appendix A. A procedure for the protection of vulnerable adults is provided at Appendix B. The purpose and aim of these procedures is to:

- Promote safe practices and challenge poor and unsafe practice;
 - Ensure staff receive adequate training and supervision;
 - Identify instances in which there are grounds for concern about a child's or vulnerable adults welfare and take action to keep them safe;
- and,
- Take appropriate action to prevent unsuitable people working with children and young people and vulnerable adults.

Safeguarding Policy – General Statement

4.2 The procedures are designed to ensure consistent, effective and fair treatment for all. The procedures have been impact assessed to ensure they do not adversely affect individuals on the grounds of sex, transgender, marital or civil partnership status, racial group, nationality, sexual orientation, religion or belief, disability or age or social status.

4.3 In developing policies and procedures regarding the protection of children and vulnerable adults, the governing body will consult with, and take account of, guidance issued by the relevant Government Department, the Independent Safeguarding Authority (ISA) and other relevant bodies and groups.

4.4 The Great Out-tours procedures for the protection of children and vulnerable adults have been developed in cooperation with the Local Authority Designated Officer (LADO). The Great Out-tours will refer concerns that a child or vulnerable adult might be at risk of significant harm to the LADO or Adult Social Services.

4.5 John Brooksbank and all The Great Out-tours staff will receive training adequate to familiarise them with child and vulnerable adult protection issues and responsibilities and The Great Out-tours procedures and policies.

5. Designated Member of Staff

5.1 The Great Out-tours has designated the Managing Director, Mr John Brooksbank (Tel 01825 729158) as having lead responsibility for safeguarding (and particularly the designated senior officer for the protection of children and vulnerable adults).

5.2 The designated senior officer will provide an annual report setting out how The Great Out-tours has discharged its duties, including a report on the training that staff have undertaken, significant risks and the number of any child protection and vulnerable adult allegations and incidences (with no reference to individuals) that have occurred during the year.

6. CRB Checks

6.1 All staff over the age of 18 (excluding client) are subject to enhanced CRB checks. A statement on the handling and safekeeping of CRB Disclosure information is provided at Appendix C.

7. Allegations against Staff

7.1 The Great Out-tours recognises that due to the nature of frequent contact with children, young people and vulnerable adults, a staff member of person working on behalf of The Great Out-tours may have an allegation of abuse or misconduct made against them. The Great Out-tours recognises that an allegation may be made for a variety of reasons and the facts of the allegation may or may not be true. The Great Out-tours procedure for dealing with such a situation is provided at Appendix D.

8. Monitoring and Review Arrangements

8.1 The Great Out-tours will monitor at least annually how far its overarching policy at para 2.1 is being delivered, with particular reference to

- its goal of reducing year by year the number and severity of accidents and the potential for accidents;
- maintaining the current very low incidence of anti-social behaviour (e.g. drugs, vandalism, petty theft) and abuse (see below);
- continuing to promote the physical and emotional health of our students and the adoption of healthy lifestyles, including within lesson plans and curriculum.

8.2 The operation of procedures for safeguarding will be kept under review by the Managing Director and will be reviewed annually by the Academic Committee. The policies and procedures listed at paragraph 2.2 will be reviewed at least at three yearly intervals.

- Approved By: Corporation
- Date of Approval: Tuesday 5 October 2010
- Frequency of Review: Annually.
- Date of Next Review: October 2011

Appendix A Child Protection Policy

1. Background

1.1 The Great Out-tours is committed to safeguarding and promoting the welfare of all of its students. Throughout this procedure reference is made to “children and young people”. This term is used to mean anyone who has not yet reached his/her 18th birthday (Children Act 1989 & 2004).

1.2 This procedure relates to all students under the age of 18 studying at The Great Out-tours, including 14-16 students on taster days or part time courses, work experience students.

2. Types of Abuse

2.1 Physical abuse – physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Neglect – neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs. It will result in serious impairment of the child's health or development.

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

Emotional abuse – emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self worth. Some level of emotional abuse is present in all forms of abuse.

Financial abuse - financial abuse takes many forms, from denying someone access to funds, to making someone solely responsible for money while the other person is handling money irresponsibly. Money becomes a tool by which the abuser can further control the victim.

3. Designated persons with responsibility for child protection

3.1 Senior staff member with lead responsibility

The designated senior officer, Mr John Brooksbank, Managing Director, (Tel 01825 729158) has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within The Great Out-tours.

3.2 The designated senior officer is responsible for securing arrangements for:

- Overseeing the referral of cases of suspected abuse or allegations to the LADO
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents of children and young people within The Great Out-tours are aware of The Great Out-tours's child protection policy
- Liaising with the LADO and other appropriate agencies
- Liaising with primary/secondary schools which send pupils to The Great Out-tours to ensure that appropriate arrangements are made for the pupils
- Liaising with employers and training organisations that receive children or young people from The Great Out-tours on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in child protection issues and are aware of The Great Out-tours child protection procedures.

4. Dealing with Disclosure, Allegations & Suspicions of Abuse and Procedure for Reporting Concerns

4.1 All staff have a duty of care to the children, young people & adults studying at The Great Out-tours.

4.2 If a member of staff suspects a case of potential child abuse, potential harm or misconduct, they should advise John Brooksbank (lead responsibility) regarding this information as soon as possible.

4.3 If the suspicion of abuse or misconduct relates to a child who will be leaving the The Great Out-tours premises, the member of staff should advise the child to remain on the site whilst they seek advice from a designated officer.

4.4 The designated officer will speak to the member of staff concerned immediately or at the very earliest opportunity, will be able to advise and support the staff member and investigate the issue.

4.5 In the event that a child tells a member of staff about possible abuse or a member of staff receives an allegation/suspicion of abuse:

- Listen carefully and stay calm.
- Do not interview the child, but question normally and without pressure, in order to be sure that you understand what they are telling you.
- Do not put words into the child's mouth.
- Reassure the child that by telling you, they have done the right thing.
- Inform the child that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the child said, did and your questions etc.
- Preserve any evidence relating to the claim.
- Take into consideration any child's disability or other special need,

including age and gender, any communication difficulties and any religious, cultural or ethnic background.

- Staff should not investigate concerns or allegations themselves, but should report them immediately to a designated officer. Staff receiving allegations of abuse out of normal The Great Out-tours hours should contact the Managing Director.
- All allegations will be investigated as quickly as possible.

4.6 The designated senior and deputy officers should refer to the red Child Protection Procedures folder held by the Head of Student Services for advice on information to be taken from the child and action to take.

Where the allegation or suspicion of abuse is considered to be serious or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the senior child protection officer should immediately discuss the matter with the relevant Children's Services Duty and Assessment Team and where relevant the host school of the student.

5. Action of Designated Officer on Receiving an Allegation or Suspicion of Abuse

5.1 On receipt of an allegation or suspicion of abuse the designated person should:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- Record information about times, dates, locations and names of potential witnesses.
- Inform the student's main place of study (where the student's main place of study is not The Great Out-tours e.g. school) of the concern or disclosure and record a note of the date, time and contact of whom the concern was reported to and the agreed course of action.
- Make an initial assessment based on the information received, consulting with the deputy designated officers and LADO as appropriate (It is important that the designated person does not investigate the allegation. The initial assessment is to determine whether the allegation warrants further investigation).
- Where an allegation is considered to be a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the children services duty and assessment team 01323 747373 and to the LADO.

6. Enquiries and Investigations

6.1 If there is an investigation by an external agency, the designated officer will normally be involved in the discussions and will ensure The Great Out-tours gives every assistance with the agency's enquiries. The designated officer will ensure that appropriate confidentiality is maintained in connection with the enquiries.

7. Allegations of Abuse against Members of Staff

7.1 The Great Out-tours recognises that an allegation may be made against a member of

staff for a variety of reasons and the facts of the allegation may or may not be true. The procedure for how such an occurrence will be dealt with is provided at Annex D.

7.2 Staff that receive an allegation about another member of staff should immediately report this to the designated senior officer. Where John Brooksbank is the person against whom the allegation is made, the report should be made to The Great Out-tours Company Secretary.

8. Allegations of Abuse against a Student

8.1 The designated senior officer may take the decision to suspend an adult student if they are alleged to have abused a child or young person. Suspension may be considered at any stage of the investigation. It is a neutral act, not a disciplinary sanction. The student will remain suspended pending the outcome of the investigation.

9. Action in Respect of False Allegations

9.1 False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the LADO in order that other agencies may act upon the information.

9.2 The designated senior officer shall:

- inform the individual against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling/support.
- inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- where the allegation was made by a child other than the alleged victim, consideration to be given to informing the parents/carers of that child.
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

9.3 In the event that an allegation is shown to have been deliberately invented or malicious, the designated senior officer should consider whether any disciplinary action is appropriate against the person who made the accusation.

10. Records

10.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken against a member of staff, details retained on the member of staff's personal and confidential file in line with the disciplinary policy.

11. Confidentiality

11.1 Every effort should be made to maintain confidentiality within The Great Out-tours and guard against unwanted publicity while allegations are being investigated. In accordance with the Association of Chief Police Officers (ACPO) guidance, the police will not normally provide any information to the Press that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.

Appendix B

Protection of Vulnerable Adults Policy

1. Background

1.1 The Great Out-tours is committed to safeguarding and promoting the welfare of all of its students. Throughout this procedure reference is made to “vulnerable adults”.

1.2 A person is a vulnerable adult if he/she “has attained the age of 18 and—

a) is in residential accommodation,

b) is in sheltered housing,

c) receives domiciliary care,

d) receives any form of health care,

e) is detained in lawful custody,

f) is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43),

g) receives a welfare service of a prescribed description,

h) receives any service or participates in any activity provided specifically for persons who fall within subsection (9),

i) payments are made to him (or to another on his behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001 (c. 15), or

j) requires assistance in the conduct of his own affairs” (Safeguarding Vulnerable Groups Act, 2006).

1.3 The procedure applies to all vulnerable adults studying at The Great Out-tours, including students on part time courses and work experience placements.

1.4 The enrolment and admissions process will be the predominant means by which students that fall under the definition of vulnerable adult will be identified and their tutor will be advised accordingly to ensure that appropriate systems of support are in place.

2. Types of Abuse

2.1 Physical abuse – including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

Neglect – including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Sexual abuse – including rape or sexual assault or sexual acts to which the adult has not consented, or could not consent to, or was pressured in to consenting.

Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercing, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Financial or material abuse – including theft, fraud, exploitation, pressure in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory abuse – including racist, sexist, that based on a person's disability and other forms of harassment, slurs of similar treatment.

Institutional abuse – demonstrated by repeated instances of neglect, poor care, management and/or professional practice.

3. Designated persons with responsibility for the protection of vulnerable adults

3.1 Senior staff member with lead responsibility

The designated senior officer, Mr John Brooksbank, Managing Director, (Tel 01825 729158) has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of vulnerable adults, and the promotion of a safe environment for vulnerable adults learning within The Great Out-tours.

3.2 The designated senior officer is responsible for securing arrangements for:

- Overseeing the referral of cases of suspected abuse or allegations to the LADO
- Providing advice and support to other staff on issues relating to the protection of vulnerable adults
- Maintaining a proper record of any vulnerable adult protection referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with the LADO and other appropriate agencies
- Liaising with organisations which send vulnerable adults to The Great Out-tours to ensure that appropriate arrangements are made for the students
- Liaising with employers and training organisations that receive vulnerable adults from The Great Out-tours on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive basic training in vulnerable adult issues and are aware of The Great Out-tours vulnerable adult protection procedures.

3.3 Other designated staff members

The designated deputy officer, Mrs Julie Brooksbank, Company Secretary (Tel 01825 729158):

- Reports to the senior member of staff with lead responsibility
- Will know how to make an appropriate referral
- Will be available to provide advice and support to other staff on issues relating to the protection of vulnerable adults
- Has particular responsibility to be available to listen to vulnerable adults studying at The Great Out-tours
- Will deal with individual cases, including attending case conferences and review meetings as appropriate.

4. Dealing with Disclosure, Allegations & Suspicions of Abuse and Procedure for Reporting Concerns

4.1 All staff have a duty of care to the children and young people studying at The Great Out-tours.

4.2 If a member of staff suspects a case of potential vulnerable adult abuse, potential harm or misconduct, they should advise one of the designated officers (John or Julie Brooksbank) at the earliest opportunity that they wish to discuss a vulnerable adult protection issue.

4.3 If the suspicion of abuse or misconduct relates to a vulnerable adult who will be leaving The Great Out-tours premises, the member of staff should advise the vulnerable adult to remain on the campus whilst they seek advice from a designated officer.

4.4 The designated officer will speak to the member of staff concerned immediately or at the very earliest opportunity, will be able to advise and support the staff member and investigate the issue.

4.5 Many incidents of abuse only come to light because the alleged abused individual discloses it themselves. The abused person may not realise that they are being abused and may not be aware of the significance of what they are telling you.

4.6 Some disclosures happen after many years. There may be a good reason for this and any delay in reporting or disclosing by an alleged abused person should not cast doubt on their truthfulness. The alleged abuse may have occurred at The Great Out-tours, home or within another service or setting. All allegations are to be taken seriously and report immediately to the senior or deputy designated officer.

4.7 In the event that a vulnerable adult tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Take seriously to what you are told
- Do not interview the person, but question normally and without pressure, in order to be sure that you understand what they are telling you.
- Do not put words into the person's mouth.
- Reassure the person that by telling you, they have done the right thing.
- Inform the person that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the person said, did and your questions etc.
- Preserve any evidence relating to the claim.
- Take into consideration any disability or other special need, including

age and gender, any communication difficulties and any religious, cultural or ethnic background.

- Staff should not investigate concerns or allegations themselves, but should report them immediately to a designated officer. Staff receiving allegations of abuse out of normal The Great Out-tours hours should contact the Managing Director.
- All allegations will be investigated as quickly as possible.

4.8 If the designated officer has reason to believe that the learner may be at risk on leaving The Great Out-tours premises or when he/she return home, the designated officer will immediately contact the individual's Care Management Team. If the individual is not known to be in receipt of care services or it is out of normal office hours the protection officer will contact the Social Services Adults Emergency Duty Team. The learner should be asked to remain at The Great Out-tours until guidance has been received from Adult and Community Services or the Police.

5. Actions of Designated Officer on Receiving an Allegation or Suspicion of Abuse

5.1 On receipt of an allegation the designated person should:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- Record information about times, dates, locations and names of potential witnesses.
- Inform the student's main place of study (where the student's main place of study is not The Great Out-tours) of the concern or disclosure and record a note of the date, time and contact of whom the concern was reported to and the agreed course of action.
- Immediately carry out an initial fact find investigation. If the fact find identifies further cause for concern the protection officer will share the report with Adult Social Services and the Police. (It is important that the designated person does not investigate the allegation. The initial assessment is to determine whether the allegation warrants further investigation).
- Where an allegation is considered to be a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Adult Social Services Team or LADO.

6. Enquiries and Investigations

6.1 If there is an investigation by an external agency, the designated person will normally be involved in the discussions and will ensure The Great Out-tours gives every assistance with the agency's enquiries. The designated person will ensure that appropriate confidentiality is maintained in connection with the enquiries.

7. Allegations of Abuse against Members of Staff

7.1 The Great Out-tours recognises that an allegation may be made against a member of staff for a variety of reasons and the facts of the allegation may or may not be true. The procedure for how such an occurrence will be dealt with is provided at Annex B.

7.2 Staff that receive an allegation about another member of staff should immediately report this to the designated senior officer. Where John Brooksbank is the person against whom the allegation is made, the report should be made to The Great Out-tours Company Secretary.

8. Allegations of Abuse against a Student

8.1 The designated senior officer may take the decision to suspend an adult student if they are alleged to have abused a child or young person. Suspension may be considered at any stage of the investigation. It is a neutral act, not a disciplinary sanction. The student will remain suspended pending the outcome of the investigation.

9. Action in Respect of False Allegations

9.1 False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to Adult Social Services in order that other agencies may act upon the information.

9.2 The designated senior officer shall:

- inform the individual against whom the allegation is made orally and in writing that no further disciplinary or other action will be taken. Consideration should be given to offering counselling/support.
- inform the carers of the alleged victim that the allegation has been made and of the outcome.
- prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

9.3 In the event that an allegation is shown to have been deliberately invented or malicious, the senior designated officer should consider whether any disciplinary action is appropriate against the person who made the accusation.

10. Records

10.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken against a member of staff, details retained on the member of staff's personal and confidential file in line with the disciplinary policy.

11. Confidentiality

11.1 Every effort should be made to maintain confidentiality within The Great Out-tours and guard against unwanted publicity while allegations are being investigated. In accordance with the Association of Chief Police Officers (ACPO) guidance, the police will not normally provide any information to the Press that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence.

Safeguarding Policy – Appendix C. Statement on the handling and safekeeping of CRB Disclosure information.

Appendix C

Statement on the handling and safekeeping of CRB Disclosure information

1. Introduction

It is a requirement of the Criminal Record Bureau's Code of Practice that all Registered Bodies must have a written policy on the correct handling and safekeeping of Disclosure information. It also obliges Registered Bodies to ensure that a body or individual, on whose behalf they are countersigning Disclosure applications, has a written policy.

2. Policy Statement - General principles

All staff and over 18 year olds (who are not The Great Out-tours students) are subject to an Enhanced CRB check.

As an organisation using the Criminal Records Bureau (CRB) Disclosure service to help assess the suitability of applicants for positions of trust, The Great Out-tours complies fully with the CRB Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information and has a written policy on these matters, which is available to those who wish to see it on request.

3. Storage and access

Disclosure information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

4. Handling

In accordance with section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom Disclosures or Disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

5. Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Safeguarding Policy – Appendix C. Statement on the handling and safekeeping of CRB Disclosure information.

6. Retention

Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep Disclosure information for longer than six months, we will consult the CRB about this and will give full consideration to the data protection and human rights of the individual before doing so. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Before the disclosure is destroyed, a record will be kept detailing the date the disclosure was obtained, the level of disclosure and the unique reference number. The central record of disclosures will include staff, volunteers and governors and will be maintained by the HR Officer. Access will be strictly controlled and limited to those who are entitled to see it as part of their duties.

7. Disposal

Once the retention period has elapsed, we will ensure that any Disclosure information is immediately destroyed by secure means, i.e. by shredding, pulping or burning. While awaiting destruction, Disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). We will not keep any photocopy or other image of the Disclosure or any copy or representation of the contents of a Disclosure. However, notwithstanding the above, we may keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

Safeguarding Policy – Appendix D. Procedure for Dealing with Allegations of Abuse against Members of Staff

Appendix D

Procedure for Dealing with Allegations of Abuse against Members of Staff

1. Procedure

It is essential that complaints are dealt with fairly, quickly and consistently, in a way that provides effective protection for the child or vulnerable adult and at the same time supporting the person who is the subject of the allegation.

Whilst the welfare of the child or vulnerable adult is the paramount concern, it is recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within The Great Out-tours will do so with sensitivity. The Great Out-tours may hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation.

Subject to consultation with the Police or other investigating agency, the designated person shall:

- inform the child/vulnerable adult or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- ensure that the parents/carers of a child making an allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- inform the Chair of Governors of the allegation and the investigation.

The designated person shall keep a written record of the action taken in connection with the allegation.

2. Suspension of staff

Suspension should not be automatic. In respect of staff other than the Managing Director, suspension can only be carried out by the Managing Director.

Suspension may be considered at any stage of the investigation. It is a neutral act, not a disciplinary sanction and shall be on full pay. Consideration should be given to alternatives e.g. paid leave of absence, agreement to refrain from attending work, change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- where a child or vulnerable adult is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a trade union representative (if they are a member of a trade union), or a colleague.

The member of staff should be informed that an allegation has been made and that

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consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation. Written confirmation of the suspension, with reasons, will be provided and sent, in accordance with The Great Out-tours Disciplinary procedure.

Where a member of staff is suspended, the designated person should address the following issues:

- the Governing Body should receive a report that a member of staff has been suspended pending investigation, the detail given to the governing body should be minimal
- where John Brooksbank has been suspended, the Company Secretary will need to take action to address the management of The Great Out-tours
- at the Managing Director's discretion, the parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension
- senior staff who need to know of the reason for the suspension should be informed
- depending on the nature of the allegation, John Brooksbank should consider whether a statement to the students of The Great Out-tours and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity.

John Brooksbank shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO/Adult Social Services and external investigating authorities should be consulted. Where appropriate the LADO/Adult Social Services may give advice about suspension but the decision remains with the Managing Director.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals. The suspension should remain under review in accordance with The Great Out-tours disciplinary procedures.

3. The disciplinary investigation

This procedure is separate from the disciplinary procedure, which may be used following the results of the investigation under this procedure. Alternatively, an incident may be so serious, or there may be sufficient evidence to proceed straight away with the disciplinary procedure. Any disciplinary investigation will be conducted in accordance with the existing staff disciplinary procedures.

The investigating officer will notify the member of staff of:

- The disciplinary charge against him/her.
- That a management investigation is taking place
- That a management investigation interview will take place with them
- That they are entitled to be accompanied or represented by a trade union representative or colleague.

The Managing Director investigating the allegations will:

- gather all the relevant facts promptly;
- take statements from all parties and witnesses involved;
- collect documentation relating to the allegation.

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The Managing Director will then determine whether there is substance to the allegation. The decision taken will be communicated to the member of staff who has been investigated. If it is decided that a disciplinary hearing will take place, this will follow the process outlined in the Disciplinary procedures, including the right of appeal. Every effort will be made to manage cases to avoid any unnecessary delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation. Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling. The child/vulnerable adult making the allegation and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to The Great Out-tours of the member of staff (if suspended). The designated officer should give consideration to what information should be made available to the general population of The Great Out-tours.

4. Dismissal/Resignation

If a member of staff is dismissed or resigns before the disciplinary process is completed, The Great Out-tours has a statutory duty to inform the Independent Safeguarding Authority and the member of staff will be advised of this. The fact that a person tenders their resignation, or ceases to provide their services, will not prevent an allegation being followed up in accordance with this policy. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children/vulnerable adults including any in which the person concerned refuses to co-operate with the process. Wherever possible the person should be given full opportunity to answer the allegation and make representations. However, if the person does not cooperate, the process should continue. It may be difficult, however, to reach a judgement on whether the decision can be regarded as substantiated based on all the information available. It may also not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible