

Snap Operations Manual – 1. Snap Organisation & Management
1-6-1 Snap Learner Safeguarding Policy

Prepared by: Angela Novell	Issue Number: 6	Date of Issue: June 2018 (reviewed in October 2020, July 2021 and May 2022)
Approved by: Board of Trustees	Signed:	Date:

SNAP LEARNER SAFEGUARDING POLICY **(Protecting Young People and Adults at Risk)**

MK SNAP will take all reasonable steps to safeguard young people below age 18, and Adults at Risk, who attend the centre.

MK SNAP will comply with the following government legislation in respect of Learner safeguarding:

1. [Care Act \(2014\)](#)
2. [Safeguarding Vulnerable Groups Act 2006](#)
3. [Children and Families Act 2014](#)
4. [The Mental Capacity Act \(including Deprivation of Liberties\) \(2005\)](#)
5. [Counter-Terrorism and Security Act \(2015\)](#)

MK SNAP is committed to the policy, aims, objectives and procedures for protecting Adults at Risk as set out by the MK Safeguarding Partnership December 2021 – Multi Agency Policy [Safeguarding Partnership Policies & Procedures; Milton Keynes Safeguarding Partnership \(mktogether.co.uk\)](#)

Reason for this Policy

The policy exists to ensure that MK SNAP implements appropriate arrangements and procedures to protect young people and adults at risk who attend the centre from harm by ensuring Learners;

- Feel secure in a supportive environment
- Are free to focus on their work and personal development
- Can rely on people in positions of trust
- Know who they can talk to if they have any concerns
- Can be confident that any problems that do arise will be properly and effectively dealt with.

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Definition of Safeguarding

Safeguarding is a core element of all aspects of MK SNAP's activity. The term Safeguarding describes the broader preventative and precautionary approaches to planning and procedures that are necessary to be in place to protect all learners, staff and visitors and minimise risk from any potential harm. Protection of children and adults at risk, safer recruitment practice and health and safety are all aspects of Safeguarding.

MK SNAP recognises that personal safety is a fundamental precondition for effective and successful teaching and learning and can only be felt in a safe learning environment that promotes well-being, safety and security for all learners, staff and visitors. For definitions of the types of abuse and neglect see Annex 1.

For the purposes of this policy a **child or young person** is defined as follows:

' Any person aged 18 and under'

For the purpose of this policy an **Adult at Risk (previously referred to as a Vulnerable Adult)** is defined as follows:

Definition of an adult at risk (care Act 2014) a person aged over 18 who:

- **Has need for care and support**
- **is experiencing or at risk of abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of or the experience of abuse and neglect.**

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We have a statutory duty to safeguard adults at risk.

Designated Safeguarding Officer & Safeguarding Team at MK SNAP

Designated Safeguarding Officer DSO	Steve Oliver Head of Learner Services	steve.oliver@mksnap.org 01908 690330
Deputy Designated Safeguarding Officer DDSO	Steve Carruthers Director of Education	steven.carruthers@mksnap.org 01908 690330
Deputy Designated Safeguarding Officer DDSO	Steph Passfield Head of Support Services	steph.passfield@mksnap.org 01908 690330
Senior Safeguarding Manager (SSM)	Angela Novell CEO	angela.novell@mksnap.org 01908 690330
Trustee link for Safeguarding	Trustee MK SNAP Stevie Pattison-Dick	stevie.p-d@mksnap.org
Dedicated email for anyone, including a member of the public wishing to report a concern about safeguarding at MK SNAP		safeguarding@mksnap.org

Role of the Designated Safeguarding Officer (DSO)

The designated senior member of staff with lead responsibility for safeguarding children, young people and adults at risk is the Designated Safeguarding Officer. She/he will be assisted by other designated members of staff drawn from management. They will be suitably experienced. Designated members of staff have a key responsibility for raising awareness, within the staff, of issues relating to the welfare of children, young people and adults at risk, and the promotion of a safe environment within MK SNAP.

All members of staff, including the designated safeguarding team, receive training in safeguarding children, young people and adults at risk and inter-agency working, as

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recommended by the Milton Keynes Safeguarding Board (MKSB). They will receive accredited training at least every three years and refresher training annually. The Team is required to keep up to date with developments in safeguarding as required.

We have a dedicated noticeboard with information for staff, learners and families to see information about how we keep everyone safe which is in our reception area

Designated Officers are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant agency;
- Maintaining a proper record of any safeguarding referrals, complaint or concern (even where that concern does not lead to a referral);
- Ensuring that parents or carers of children, young people and vulnerable adults within MK Snap are aware of the company's policy and procedures with regards to safeguarding.
- Liaising with appropriate agencies.
- Completing the monthly incident report form and sending it to the relevant authority.
- Ensuring that all staff receive training in safeguarding children, young people and adults at risk and that refresher training takes place at least every three years.
- Ensuring that all members of staff are aware of MK Snap's Procedures for Protecting Children, Young People & Adults at Risk.
- Dealing with Staff /Volunteer disciplinary issues following alleged harm or abuse to a learner

Staff Responsibilities

- All Staff are responsible for:
- Being vigilant to potential signs that learners may be being harmed or abused
- Being vigilant to the actions and behaviour of learners in the centre
- Using the MK Snap Whistleblowing arrangements for reporting concerns about fellow staff members/volunteers
- Reporting all suspicions and allegations of harm/abuse to learners to the Designated Safeguarding Officer

Staff & Volunteer Safeguards – Code of Practice & Behaviour

The list of safe practice and appropriate behaviour is designed to assist staff to safeguard themselves at work, and to support the protection of children, young people and adults at risk.

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In some cases there may be instances where staff may be in breach of the code of practice and behaviours set out below. Each case needs to be identified and discussed with the Designated Safeguarding Officer when a risk assessment for the particular event will be carried out which either will result in agreement for the practice to continue, or a decision for the practice to discontinue immediately.

Lone and One to One Working

- Avoid lone working at MK SNAP premises due to reasons of health & safety
- Avoid working in rooms where you cannot be seen by others
- Avoid being alone with known/unknown individuals
- Make sure all areas are well lit
- Make sure someone in authority knows where you are at all times
- Avoid physical contact at all times

Relationships & Socialising

- Staff should not socialise or develop personal relationships with SNAP learners.
- Staff should not give their personal home or mobile phone numbers to SNAP learners, or contact them outside of working hours
- Staff should not contact learners outside of the remit of their direct role within the organisation
- Never engage in physical contact
- Do not initiate emotional or physical relationships with children, young people and adults at risk
- Do not take children, young people, or adults at risk to your home, or discuss issues relating to your personal life
- Avoid, where possible, doing things of a personal nature for children, young people or adults at risk that they can do for themselves
- Never allow or encourage touching a child, young person or adult at risk in a sexually suggestive manner.
- Never allow children, young people, or adults at risk to swear, or use sexualised language unchallenged
- Never allow allegations made by children, young people or adults at risk to go unchallenged, unrecorded or not acted upon.
- Do not accept gifts from children, young people or adults at risk
- Ensure appropriate clothing is worn whilst working with children, young people or adults at risk.
- Do not socialise with young people or adults at risk via social network sites, such as Facebook.

Travelling

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- Learners can only travel in Staff member's cars if they are fully comprehensively insured for business use, and when transporting learners to specific events as part of the Snap provision (i.e. theatre, pantomime, Christmas Parties etc)
- The journey must be planned and the risk assessment should be agreed by a member of the management team prior to the journey being made
- Seat belts must be worn at all times
- It is good practice to ensure that staff are not in a one to one situation with a learner; so where at all possible ensure that two staff accompany a lone learner

Reporting Cases of Actual or Suspected Harm/Abuse

- Initial cases, including incidents, are reported internally via the MK SNAP Learner Incident Reporting Procedure. If harm or abuse is suspected staff must report this to the Designated Safeguarding Officer (DSO) who will investigate the matter further, and where appropriate make disclosures to the relevant agency. The reporting process for disclosure of actual or suspected cases of abuse or harm to learners depends on whether the learner is defined as a young person or an adult at risk. Disclosures in respect of young people are made to the Milton Keynes Local Authority Multi-Agency Safeguarding Hub (MASH team) or in respect of adults to the Milton Keynes Adult Social Care Assessment Team (ASCAT)
- The document required for reporting potential abuse of an adult can be found by following the link [here](#).
- The document required for reporting potential abuse of a child/young person can be found by following the link [here](#).
- If emergency intervention is required for an adult at risk then the ASCAT team should be called on (01908) 253772 between the hours of 9am and 5.15pm. If there is an emergency outside of these times then the number is (01908) 725005
- If emergency intervention is required for a child or young person then Children's Services should be called on (01908) 253169 or (01908) 253170 between the hours of 9am and 5.15pm. If there is an emergency outside of these times then the number is (01908) 265545
- The staff member who has first contact with the learner making the alleged allegation must complete an incident form.
- The Chief Executive will report accidents, incidents and cases of disclosure at the SNAP Trustees Board Meetings by exception

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Guidance for Handling Disclosure of Abuse

Staff should NOT investigate concerns or allegations themselves, but should report them immediately to the Designated Safeguarding Officer (DSO). When a young person or adult at risk makes an allegation of abuse, the member of staff who receives it should:

- Reassure the person that they have done the right thing;
- Listen and not interrupt;
- Not promise the person that they will keep the matter confidential. Explain to him/her that you must report the matter to the Designated Safeguarding Officer (or deputy) as this is part of our duty of care to learners, if you are in doubt as to whether the matter is a safeguarding issue, check with one of the safeguarding team members (contacts on page 3)
- Only ask simple, open, non-leading questions. For example, if a learner tells you they have been hurt, ask, 'Can you describe how that happened?' rather than 'Did someone hit you?'
- Accept what the learner is saying and do not offer an alternative interpretation of the alleged events;
- Note anything about the learner which may be connected, for example, any visible injuries including the position and description;
- If in doubt, seek advice from one of the designated members of staff;
- Complete the relevant documentation and submit to a Designated Safeguarding Officer or deputy

Staff Training

New employees, volunteers and trustees to MK SNAP will receive an induction which includes information of all SNAP Policies and Procedures. All staff, volunteers and trustees at MK SNAP receive training in the application of the principals in working with children, young people or adults at risk, including appropriate Safeguarding training.

As an agent/contractor of Milton Keynes Council (or other authority) all staff are required to attend specific safeguarding training as specified by the Council.

Designated Safeguarding Officers and deputies will receive any additional training they require to enable them to effectively signpost or refer allegations or cases of suspected harm/abuse to learners.

Safer Recruitment

Before appointing staff, trustees and volunteers, MK SNAP will carry out checks, in line with our Safer Recruitment Policy to establish whether any potential applicant

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has any previous convictions that would make them unsuitable for working with adults at risk and young people. At no time will a volunteer or visitor to MK SNAP be allowed to have contact with any learner without a member of staff being present. MK SNAP keep a Single Central Record that records safeguarding training and where appropriate DBS numbers for individuals who have regular access to learners.

Whistle Blowing

MK SNAP operates a whistleblowing policy and procedure which allows anyone including a member of the public, to report concerns and suspected wrongdoing by using our dedicated email address which is safeguarding@mksnap.org This was implemented in May 2018 to ensure that we are able to respond to any issues raised by anyone at any time.

Reporting and Dealing with Allegations of Abuse against Members of Staff, Volunteers or Trustees

In rare instances, a member of staff, volunteer or trustee of an educational institution has been found responsible for abuse. Additionally, because of their (sometimes) frequent contact with children, young people and adults at risk, those within this group may have allegations of abuse made against them. MK SNAP recognises that an allegation of abuse made against a member of this group may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that an investigation is thorough and not subject to delay.

If such an incident were to arise then this must be reported to the Designated Safeguarding Officer (unless they are implicated in any accusation) or a member of the designated safeguarding team.

If the allegation involves a child or young person the Designated Safeguarding Officer will need to report the matter to the Local Area Designated Officer (LADO) Jo Clifford on lado@Milton-keynes.gov.uk prior to contacting her on 01908 254307.

If the allegation involves an adult at risk then the matter follows the normal reporting procedures as described elsewhere in this policy.

PREVENT Strategy

MK SNAP realises that it is a possibility that some of its learners may be a target for radical groups. While it is highly unlikely that the learners will become involved directly with terrorist acts they could be vulnerable to indirect activity. If any member of staff at MK SNAP suspects any sort of coercion then the usual safeguarding process should apply.

For more information or if you are unsure whether the issue you are dealing with relates to a PREVENT related incident please contact the national Police Prevent line on 0800 011 3764.

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Related MK SNAP Policies & Procedures

- 1-4-1 Health & Safety Policy
- 1-4-4 Accident Investigation and Reporting Procedure
- 1-6-2 Learner Incident Reporting Procedure
- 1-6-3 Allegations or Suspected Harm/Abuse Procedure
- 1-6-4 SNAP Policy on Restrictive Physical Intervention
- 1-9-1 Staff Recruitment Procedure (Safer Recruitment)
- 1-9-6 Whistle Blowing Policy

Signatures

Position	Name	Signature	Date
Author			
CEO			
Board of Trustees			

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