



Safeguarding Policy

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Background

The AA is committed to supporting and promoting the welfare of staff, students and visitors and is committed to the provision of a safe environment conducive to work, study and the enjoyment of a positive experience for all members of its community.

The AA recognises that its activities may involve children (e.g. individuals who are under 18 years old) or vulnerable adults (e.g. those over 18 who are rendered vulnerable to harm or exploitation due to their personal situation and/or social circumstances).

The AA wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children and vulnerable adults and is committed to working in partnership with other organisations (as appropriate) to facilitate this.

In the discharge of its functions, and in implementing this policy, the AA will remain mindful of its duty of care and other legal obligations, such as those it owes under the Health and Safety at Work Act 1974, the General Data Protection Regulation (GDPR) (EU) 2016/679,, the Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, the Protection of Freedoms Act 2012, the Counter Terrorism and Security Act 2015.

This policy should be read in conjunction with the AA's:

Whistleblowing Policy
Data Protection Policy
Data Retention and Disposal Policy
Email Usage Policy
IT Acceptable Use Policy.

Scope

This Policy is designed to assist the AA to achieve the commitments set out above and to take reasonable steps to safeguard those who are vulnerable by ensuring there are clear guidelines and procedures for identifying risk, reporting concerns and that appropriate action is taken.

Examples of areas where the AA may have contact with children and adults who may be vulnerable may include (this is not an exhaustive list):

- Teaching, supervision and support of students;
- School administration;
- Summer schools (for example, little architects), school visits, and other events such as work experience;
- Outreach or widening participation activities taking place on or off campus;
- Attendance at private functions run commercially by the AA;
- Conferences;
- Field trips, excursions & other activities such as volunteering and other social activities;
- The activities of student societies and networks

This policy sets out how the AA will deal with concerns that are raised that an individual may be at risk of exploitation, harm or abuse (including radicalisation), and the type of action that the AA may take to manage such matters and provide support.

Examples of the type of situations which may result in the AA implementing this policy and procedure may include where:

- a child or adult raises an allegation of abuse, harm or other inappropriate behaviour;

- a student or staff member discloses information involving themselves or family members which gives rise to possible concerns that a vulnerable adult or child is being harmed or abused ;
- there are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation). The indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member’s responsibility to decide whether a child or adult has been abused or harmed or subjected to abuse or harm, but only to raise concerns that they may have;
- there are observable changes in a child or adult’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 in relation to, for example, his/her criminal convictions, or downloading, possession or distribution of inappropriate images or extremist material.
- Concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

Key Principles

The AA will take all safeguarding concerns including suspicions and allegations of exploitation, harm or abuse (including radicalisation) seriously and will report concerns promptly.

The AA has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. The AA is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including DBS checks and other checks where appropriate.

Definitions

Vulnerability

For the purposes of this Policy the AA defines vulnerability as being when a child or adult is at risk of exploitation, harm or abuse, including the risk of radicalisation. While the definition of “vulnerable adult” and “child” are set out below, the Policy notes that a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation.

Vulnerable Adult

The AA defines a vulnerable adult as a person aged 18 or over who is, or may be, in need of services by reason of mental or other disability, age or illness, and who is, or may be, unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation, including being drawn into terrorism.

Child

The AA defines a child as a person who is under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in higher education does not change his or her status for the purpose of this Policy.

For the purposes of this Policy the term “the AA” is deemed to include the Students’ Forum. The AA and the Student Forum are committed to working together and sharing information in order to safeguard the interests and wellbeing of children and vulnerable adults, e.g. in relation to individuals and activities with student societies.

Designated Safeguarding Officer and Safeguarding Leads

The AA’s Designated Safeguarding Officer is the Company Secretary.

T: 020 7887 4047

E: secretary@aschool.ac.uk

If the Designated Safeguarding Officer is not available, or the safeguarding concern involves for example a concern against them, then the School Director should be contacted.

The responsibilities of the Designated Safeguarding Officer include:

- Undertaking relevant training in safeguarding procedures and ensure their knowledge is kept up to date;
- Acting as a point of contact for the Safeguarding Leads and others who have safeguarding concerns, receiving information and recording those concerns;
- Acting upon concerns by following the Safeguarding Concern Procedure described below including where necessary making referrals to external agencies including social services or police;
- Monitoring the implementation of this policy and procedure.

The responsibilities of the Safeguarding Leads include:

- Acting as a point of contact for staff or students as appropriate;
- Advise those with safeguarding concerns to complete the Safeguarding Concern Form (see Appendix A)
- Referring safeguarding concerns raised to the Designated Safeguarding Officer
- Assisting Designated Safeguarding Officer with Safeguarding Concern investigations as required.

The Safeguarding Lead for students is the School Registrar:

T: 020 7887 4092

E: registraroffice@aschool.ac.uk

The Safeguarding Lead for staff (academic and administrative) is the Head of HR:

T: 020 7887 4096

E: hr-admin@aschool.ac.uk

The Safeguarding Lead for Hooke Park is the Hooke Park Administrator:

T: 01308 863588

E: hookepark@aschool.ac.uk

Safeguarding Training

The Designated Safeguarding Officer and Safeguarding Leads will undertake annual safeguarding training. [All staff members with regular student contact will undertake mandatory online safeguarding awareness training.]

Reporting Safeguarding Concerns

If the Safeguarding Concern poses an *immediate* risk of serious harm call the Police on 999 as a top priority before following the procedures below.

It is the remit of Social Services and/or the Police to investigate safeguarding concerns; however the AA will undertake a risk assessment before making a referral to such an external agency. If a member of the AA, staff or student, has any immediate risk concerns (including outside normal School hours) they may refer directly to the Police or Social Services, but otherwise they should follow the internal referral process set out below. If a direct referral is made, the member of staff or student should inform the AA's Designated Safeguarding Officer at the earliest opportunity within 24 hours of the referral.

Safeguarding concerns should be reported to the Designated Safeguarding Officer or Safeguarding Leads (see contact details above) using the Safeguarding Concern Form (see Appendix A). If you wish to discuss a referral

before completing the form you may contact the Designated Safeguarding Officer or Safeguarding Leads by phone. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain. Should a conversation with the Designated Safeguarding Officer or Safeguarding Lead (as the case may be) result in a decision not to submit a Safeguarding Concern Form or investigate the matter further, a written record detailing the circumstances and reasons for that decision will be maintained by the Designated Safeguarding Officer.

Some useful do's and don'ts for handling a safeguarding disclosure are set out within the Guidance on Safeguarding below.

In a placement or work based learning environment (such as a professional setting) a member of staff or student should normally report any safeguarding concern in the first instance to the Safeguarding Officer of the provider, or employer. If the student or staff member feels it is inappropriate to make a referral to the provider/employer Safeguarding Officer, or they do not feel they have had a satisfactory response, they should refer directly to the AA's Designated Safeguarding Officer.

If the Designated Safeguarding Officer is not available within a reasonable period (i.e. within 48hrs or where the concern is immediate, on the day the concern is raised) a Safeguarding Lead should be contacted. If the safeguarding concern involves a concern against the Designated Safeguarding Officer, then the School Director should be contacted.

Safeguarding Concern Procedure

The Designated Safeguarding Officer will on receipt of a Safeguarding Concern Form or on being made aware of a safeguarding concern will make an initial assessment of the situation to ascertain the legitimacy of the concerns raised. This assessment might include reference to publicly available information about the individual, e.g. through social media. If the concerns are deemed legitimate, an investigation will be conducted by the Designated Safeguarding Officer or their nominee(s).

Any investigation will normally be held no more than 5 working days from the concern being raised. Staff will be asked to prioritise meetings which assist the investigation.

Every effort should be made to maintain confidentiality and guard against publicity while a safeguarding concern is being investigated or considered. Apart from keeping the subject of the safeguarding concern (or where appropriate their guardian or representative) any accused person (where this would not place the subject of the safeguarding concern at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to manage the investigation.

The purpose of the investigation is to consider information about the individual and the situation, and to conduct an assessment to ascertain whether the risk is serious enough to warrant a referral to the relevant statutory authority.

The Designated Safeguarding Officer will before making a referral to the relevant statutory authority seek consensus from a panel consisting of:

- the Designated Safeguarding Officer
- the School Director;
- Safeguarding Lead for students; and
- Safeguarding Lead for staff.

In the event consensus is not achieved by the panel, the Designated Safeguarding Officer will, having due regard to the deliberations of the panel, make the final decision.

Where the concern is reported to the relevant statutory authority, full details of the safeguarding concern and the investigation will be provided including personal data required by the statutory authority relating to the

subject of the concern any accused person and relevant witnesses provided the AA is satisfied that sharing such data is required to satisfy the AA's legal obligations, to protect an individual's vital interests or where it is in the AA's or a third party's legitimate interests to share the personal data (save where there is a good reason not to share the individual's personal data which overrides those legitimate interests).

Where the concern is not considered serious enough to warrant referral to the relevant statutory authority, the Designated Safeguarding Officer may signpost the affected individual(s) to relevant support services internally and externally of the AA and take such other actions deemed appropriate in the circumstances.

Action by the AA

The AA reserves the right to take action under its disciplinary procedures should it later receive information that suggests that its conduct standards may have been breached. Staff or students who are dismissed from the AA as a result of safeguarding concerns may be reported to appropriate authorities including the Disclosure and Barring Service and any relevant professional body.

Support from internal or external services will be provided as appropriate for any individuals, staff or students, impacted by safeguarding issues.

Retention of Information

Written records of any safeguarding concerns will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.

Such written records will be held centrally and separately from a member of staff's or student's personal records.

Appendix A - Safeguarding Concern Form

Use this form to outline the nature of your concern. If you cannot complete a section, or feel a section is not relevant then leave it blank. The Designated Safeguarding Officer will treat your disclosure sensitively. It is better to refer any safeguarding concern and enable a risk assessment to take place, than not to make one because you are not yet certain.

Name of child/vulnerable adult (if known):

Date of birth or age (of child):

Gender: (M/F)

Description of the safeguarding issue (see Appendix B for more information). Your description might include a factual account of something you have witnessed or an account of something a third party has reported to you.

Time, location, date of the incident/s: (if known)

The child's/vulnerable adult's account: (if known)

Any other observations/information:

Any action you may have taken:

Signed:

Name(print):

Position:

Your Preferred Contact Method (Tel: mobile: Email)

Date:

Please continue onto another page if necessary, ensuring it is securely attached to the safety concern form.

Please send this information to a Designated Safeguarding Officer as a matter of urgency by email if possible to: Secretary@aaschool.ac.uk;

Alternatively, please send by post marked for the attention of the Designated Safeguarding Officer to:

The Architectural Association
36 Bedford Square
London
WC1B 3ES

Appendix B - Guidance on Safeguarding

The following list of useful dos and don'ts is based on those included in the *Safeguarding Vulnerable Adults: Guidance for English Higher Education Institutions (HEIs) – Department for Innovation Universities and Skills (December 2007)*

If a child or adult discloses that they are experiencing abuse or harm or if there are suspicions a child or adult is at risk of abuse or harm consider the following:

DO

Be supportive.
Take what the child or vulnerable adult says seriously
Remain calm.
Reassure them that it was right to tell someone.
Use language they understand.
Explain what will happen next i.e. that disclosure of relevant information may need to be made to the Designated Safeguarding Officer
Write down verbatim immediately afterwards what was said, including the time, place and any other observations: sign and date the record.
Pass the report to the Designated Safeguarding Officer.
Remember that you may need support. Seek advice and support for yourself from the Designated Safeguarding Officer.

DO NOT

Panic
Delay
Promise to keep secrets.
Ask leading questions
Ask them to repeat the story unnecessarily.
Express any opinions about what you are told.
Discuss the disclosure with anyone other than the Designated Safeguarding Officer and other relevant personnel.
Start to investigate.
Do not contact the alleged abuser

Guidance for staff working with students under the age of 18 years

All staff who have regular one-to-one contact with students who are under the age of 18 should adhere to the following guidance to ensure safety both for themselves and the young person.

If you have any concerns or queries arising from reading this guidance please contact the Designated Safeguarding Officer who is responsible for matters relating to safeguarding vulnerable groups.

General Guidelines

- Respect all individuals whatever their age
- Place the safety and wellbeing of the young person first. It must be placed before any personal or organisational goals and before loyalty to friends and colleagues
- Form appropriate relationships with young people. These should be based on mutual trust and respect.
- Be aware of the relative powerlessness of young people compared to staff members
- Be committed to actively preventing the exploitation and abuse of children and young people.

Guidelines for working with students under the age of 18 years

- Conduct meetings with the student either with another staff member present or in an open environment (e.g. leave office door open and do not hold meetings when lone working)
- Academic staff should follow guidance on signposting, consultation and referral to appropriate services if they have concerns about individual students.

- If physical contact is necessary e.g. for demonstration purposes, ensure it takes place only with the full consent of the student and that its purpose is clear.
- Do not use touch as a form of communication, even to comfort a student who is distressed.
- Consider implications of transporting students in your own vehicle, offer alternatives where ever possible so the student travels with peers.
- Consider your expected behaviour in certain situations and what might be considered unacceptable, e.g. sexually suggestive comments, inappropriate language.
- Be mindful that it is a criminal offence for any person in a position of trust to engage in sexual activity with someone who is under 18.
- Remember that it is not legal for students who are under 18 to buy alcohol, and that it would not be appropriate to offer them alcohol. Planning and organisation of events involving students should take this into account.

Types of Abuse or Harm

The following list is an example of the types of abuse or harm that individuals may encounter whether in a domestic setting or otherwise. This is not an exhaustive list:

physical abuse or violence, including hitting, shaking, throwing, slapping, pushing, kicking, poisoning or the giving or supply of illegal drugs, misuse of medication, burning, scalding, drowning, suffocating, restraint or otherwise causing physical harm, or inappropriate sanctions;

sexual abuse, including grooming, rape and sexual assault or sexual acts to which the individual has not consented, or could not consent or was pressured into consenting; the activities may be physical or non-physical for example involving vulnerable individuals in looking at, or in the production of, sexual images.

psychological abuse, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks;

financial abuse, including theft, fraud, exploitation, or the misuse or misappropriation of property, possessions or benefits;

radicalisation, including grooming vulnerable individuals into a particular ideology to instil views that promote “us-and-them thinking”, potentially to justify offending and the use of harm or violence against others to achieve an ideological goal

physical or emotional neglect and acts of omission, including ignoring medical or physical care needs, failure to protect a vulnerable individual from physical or emotional danger or to ensure adequate supervision, failure to provide access to social care health, or educational services, the withholding of necessities such as medication, adequate nutrition and heating; and benefits.

discriminatory abuse, including racist, sexist, ageist abuse based on a person’s disability, and other forms of harassment, slurs or similar treatment.

Internet/electronic abuse, the use of modern communication technologies (e.g. Internet, text or video messaging, e-mail, chatrooms, social media networking sites) to embarrass, humiliate, threaten, intimidate, bully or radicalise an individual in an attempt to gain power and control over them or make them commit acts they would not otherwise have committed.

It is important to note that abuse can:

- consist of a single act or repeated acts;
- 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;
- occur in any relationship;
- be perpetrated by anyone, individually or as part of a group or organisation;
- often constitute a crime, i.e. physical, sexual abuse for example, downloading or using pornographic images of children or vulnerable adults and/or storing them on AA computers or equipment.

The following may indicate that abuse is taking place (this list is not exhaustive and not all may be present):

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the child or adult's or carer's explanation appears inconsistent;
- The child or adult describes an abusive act or situation;
- Unexplained changes in behaviour, attitude or attire;
- Expression of extremist views or attitudes;
- The display of inappropriate behaviour (sexual or otherwise);
- Apparent mistrust of others, appearing secretive;
- The child or adult appears increasingly unkempt.

Prevent and Higher Education

Higher education institutions have a duty of care to students, staff and visitors. The Counter Terrorism and Security Act 2015 introduced a new statutory duty for higher education institutions to have "due regard to the need to prevent individuals from being drawn into terrorism". This means that institutions now have a statutory duty to engage with the government's Prevent agenda. The government has published guidance setting out what steps higher education institutions are expected to take to meet this duty. This is available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

Further information on the AA's approach to its implementation of the Prevent Duty in respect of safeguarding individuals who may be vulnerable to radicalisation, can be viewed online - AA's Prevent Duty Policy, which is available in the Member's area of the AA website.

Any individual the AA considers at risk of radicalisation and for whom an external referral is made will be assessed for their suitability for the Channel process.

Channel

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

- **Who does Channel work with?** Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.
- **How does Channel work?** Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to

develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.

- **What does Channel support look like?** Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.
- **How will the person be involved in this process?** A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.