

South Gloucestershire and Stroud College

**Safeguarding Children, Young People
and Vulnerable Adults Policy**

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Job Title/Role:	Vice Principal (Quality, Learner and Staff Services) Lead Safeguarding and Child Protection Officer
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Approved by:	Corporation
Date:	06/07/2017

Main aim and purpose of the policy:	To prioritise and promote the safeguarding and protection of children, young people and vulnerable adults from harm.				
Is this policy (or its constituent parts) relevant to a general equality duty? (please tick)	This policy development will assist in the elimination of unlawful discrimination and/or harassment of identified groups?	Implementation of this policy will promote equal opportunities for identified groups?	Implementation of this policy will promote positive attitudes and participation between groups?	Implementation of this policy will promote good relations between groups?	
Age	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Disability	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Gender Reassignment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Race or Ethnicity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Religion or Belief	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Marriage	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Pregnancy/ Maternity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Sex	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Sexual Orientation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Carers/ Care givers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Persons in care	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Specify any groups for which there is evidence or reason to believe that some groups or individuals could be affected differently:					
How much evidence is there:	None	A little	Some	A lot	
Is there any concern that the policy may operate in a discriminatory way?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	None	A little	Some	A lot	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Assessed relevance to equality (tick one row only)	High	Med	Low	None	Brief reason for this assessment
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Race or Ethnicity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Marriage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Pregnancy/ Maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Carers/ Care givers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
What is the next step? (tick one only)	What priority level is this policy?			Has the Policy been sent for Full EQIA, or do you believe the policy should have a Full EQIA?	
	High <input checked="" type="checkbox"/>	Medium <input type="checkbox"/>	Low <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
I am satisfied that an initial screening has been carried out on this policy/procedure and a full Impact Assessment is not required					
Completed by: Emma Jarman		Position: <i>Vice Principal</i>		Date: <i>4th July 2016</i>	

Safeguarding Children, Young People and Vulnerable Adults Policy

1. Introduction

- 1.1. South Gloucestershire & Stroud College (SGS) is committed to prioritising and promoting safeguarding and protecting all children, young people and vulnerable adults from harm whatever their personal characteristic, (as designated by SGS impact assessment guidance). SGS also aspires to support all learners as far as it is able to do so.
- 1.2. SGS College has clearly defined responsibilities under the Children Act 1989 and 2004 for learners aged under 18. The College extends these responsibilities, within the scope of this policy, to learners with learning difficulties, irrespective of age, if they are vulnerable to abuse as a result of their learning difficulty (As defined by the Vulnerable Adults Act 2006). The policy also applies to people enrolled as learners at SGS College or for whom the College has accepted a responsibility for care.
- 1.3. The policy is applicable to all learners, staff, volunteers and visitors to SGS College, whether on site or within a placement, work experience or apprenticeship setting.
- 1.4. The term 'Safeguarding children and young people' embraces both child protection and a preventative approach to keeping young people and vulnerable adults safe. 'Safeguarding' therefore encompasses learner health and safety, bullying (in person or electronically), meeting the medical needs of those with medical conditions, providing first aid, security, support/safeguarding from drugs and substance abuse.
- 1.5. 'Safeguarding and promoting the welfare of children' is defined in the Department of Education Keeping Children Safe in Education statutory guidance for schools and colleges document, which is updated annually, as:
 - 1.5.1. Protecting children from maltreatment
 - 1.5.2. Preventing impairment of children's health or development
 - 1.5.3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - 1.5.4. Taking action to enable all children to have the best outcomes

- 1.6. Statistically young people or vulnerable adults with behavioural difficulties and disabilities (learners with SEND) are more vulnerable to abuse. College staff who work within any capacity with young people or vulnerable adults with profound and/or multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.
- 1.7. The term 'Child' is defined by the United Nations Convention on the Rights of the Child as every human being below the age of 18.
- 1.8. The term 'Vulnerable Adult' is defined (under the Protection of Vulnerable Adults Regulations 2006) as a person aged 18 or over who is receiving services of a type listed below:
 - 1.8.1. Accommodation and nursing or personal care in a care home;
 - 1.8.2. Personal care or nursing or support to live independently in his/her home;
 - 1.8.3. Any services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body; social care services; or
 - 1.8.4. Any services provided in an establishment catering for a person with learning difficulties.
 - 1.8.5. This definition can include participants whose particular circumstances make them vulnerable, for example, because they are leaving (or recently left) care, they have inadequate housing or they are being supported to overcome a dependency on drugs and/or alcohol.
- 1.9. **The Conditions are:**
 - 1.9.1. A learning physical disability;
 - 1.9.2. A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
 - 1.9.3. A reduction in physical or mental capacity.
- 1.10. **The Disabilities are:**
 - 1.10.1. A dependency upon others in the performance, or a requirement for assistance in the performance of, basic physical functions;
 - 1.10.2. Severe impairment in the ability to communicate with others;
or

- 1.10.3. Impairment in a person's ability to protect him/herself from assault, abuse or neglect.

2. Statement

- 2.1. SGS College regards with the highest priority the health, safety and welfare of everyone involved in activities that are the responsibility of the College.
- 2.2. The College has a duty to ensure that its staff fulfil their responsibilities to prevent child abuse or other abuses of trust and to report any such abuse discovered or suspected. The procedures adopted are in line with the South West Child Protection Procedures (further details available at www.swcpp.org.uk).

3. Objectives

- 3.1. SGS College has clear objectives and is committed to:
 - 3.1.1. Providing a safe environment for children, young people and vulnerable adults to learn in.
 - 3.1.2. Identifying people who are experiencing or likely to experience significant harm or significant under achievement; providing support and taking appropriate action, with the objective of producing positive outcomes for the learner concerned.
 - 3.1.3. Initiating appropriate action to see that such children, young and vulnerable people are kept safe.
 - 3.1.4. Taking action to safeguard the person through working in partnership with other agencies.
 - 3.1.5. Safeguarding through the curriculum and pastoral support and by the promotion of a College ethos where the person feels secure, is valued and listened to.

4. Implementation

- 4.1. **We will:**
 - 4.1.1. Establish procedures for reporting and dealing with allegations of abuse against members of staff and other learners.
 - 4.1.2. Take appropriate action when reports of alleged abuse in the home or elsewhere are received.

- 4.1.3. Raise awareness of issues with staff and learners relating to the welfare and safeguarding of children, young and vulnerable people and the promotion of a safe environment for the children, young and vulnerable people within the College.
- 4.1.4. Aid the identification of children, young and vulnerable people at risk of significant harm, and provide procedures for reporting concerns.
- 4.1.5. Monitor trends and keep accurate and secure records of concerns about individuals, even when there is no need for immediate referral to outside agencies.
- 4.1.6. Ensure staff recruitment conforms with current legislation as described in the college's Recruitment Procedures Guidance (<https://staff.sgscol.ac.uk/CC/HR/Recruitment/Forms/AllItems.aspx>)
- 4.1.7. Work collaboratively with all relevant agencies to ensure that children, young and vulnerable people are safeguarded through the effective operation of the College's child protection and safeguarding procedures.

5. Responsibilities

5.1. The responsibility of the governing body and management committees

- 5.1.1. A governor with special responsibility for safeguarding children, called the Nominated Child Protection Governor will be nominated by the Board of the Corporation and will liaise with the Vice Principal (Quality, Learner and Staff Services), with lead responsibility for safeguarding young and vulnerable people.

5.2. The Governing Body will:

- 5.2.1. Make arrangements for ensuring that their functions relating to the conduct of the College are exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the College.
- 5.2.2. Ensure that the College operates safe recruitment procedures and ensure that all relevant checks are carried out, following DBS guidelines.
- 5.2.3. In considering these arrangements, have regard to any guidance given from time to time by the Secretary of State.
- 5.2.4. Ensure the College has a safeguarding policy and procedures that satisfy and evidence statutory requirements.

- 5.2.5. Have procedures for dealing with allegations against staff/volunteers that comply with Local Safeguarding Children's Board procedures, balance the need to protect children whilst protecting staff/volunteers from false/unfounded accusations and ensure that deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
- 5.2.6. Remedy any deficiencies or weaknesses in safeguarding arrangements without delay.
- 5.2.7. Annually review policies and how duties are discharged.
- 5.3. **The Principal should ensure through the Senior Leadership Team:**
 - 5.3.1. Policies and procedures are fully implemented and followed by staff.
 - 5.3.2. Sufficient resources and time are allocated so that designated staff can attend strategy discussions, inter-agency meetings, contribute to assessments etc.
 - 5.3.3. Operate safe recruitment and ensure checks on new staff and volunteers are carried out. Further Education establishments have a statutory duty to make reports, and to provide relevant information to the ISA (Independent Safeguarding Authority).
- 5.4. **Role of the Designated Senior Staff Member**
 - 5.4.1. The Vice Principal (Quality, Learner and Staff Services) has been designated to be responsible to the Principal and Governors for the implementation and conduct of these policies and liaison with the relevant authorities who will initiate any investigation of abuse. The **ultimate responsibility** for safeguarding and child protection remains with the designated safeguarding lead, although activities can be delegated to appropriately trained deputies.
 - 5.4.2. The Lead Safeguarding and Child Protection Officer and the Deputy Heads of Learner Services on the Bristol and Stroud campuses have deputy designated lead responsibilities and have responsibility for overseeing the operational management of this policy and the child protection and safeguarding procedure encompassing all information contained with the concerns raised within the My Concern software .

The responsibilities that are either carried out by the DSL or delegated to deputies include:

- 5.4.3. Refer cases of suspected abuse or allegations to the relevant investigating agencies.
 - 5.4.4. Act as a source of support, advice and expertise within the College when deciding whether to make a referral by liaising with relevant agencies.
 - 5.4.5. Ensure staff receive regular training. All staff members should receive appropriate safeguarding and child protection training which is regularly updated. In addition all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
 - 5.4.6. Maintain knowledge in how the Local Safeguarding Children's Board works, the conduct of case conferences, and be able to attend and contribute to these when necessary.
 - 5.4.7. Ensure all staff have access to and understand the College's Safeguarding Children, Young People and Vulnerable Adults Policy and Procedure
 - 5.4.8. Ensure relevant safeguarding policies and procedures are updated and reviewed annually.
 - 5.4.9. Provide an annual report to the Corporation.
 - 5.4.10. It is not the College's responsibility to investigate abuse.
- 5.5. **Staff**
- 5.5.1. All college staff have a responsibility to provide a safe environment in which children can learn.
 - 5.5.2. All college staff should be prepared to identify children who may benefit from early help.¹ Early help means providing support as soon as a problem emerges
 - 5.5.3. All staff members should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction.
 - 5.5.4. All staff members should attend safeguarding and child protection training which is regularly updated.
 - 5.5.5. All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early

identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

- 5.5.6. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments.
- 5.5.7 All staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Staff should never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.
- 5.5.8 All school and college staff members should be aware of the types of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Types of abuse and neglect, and examples of safeguarding issues are described in section 3.6 of this guidance.

5.6. **Discretion**

- 5.6.1. The counsellors of the learner counselling service have a duty of confidentiality to users of the counselling service (*British Association for Counselling and Psychotherapy, Ethical Framework 2002 pp3-7*).
- 5.6.2. Although a Counsellor has a duty of confidentiality, this does not apply where they become aware of a case of physical, sexual, emotional abuse or neglect. The Counsellor will discuss the situation with either the Lead Safeguarding and Child Protection Officer or the Deputy Head of Learner Services after initial discussions with the learner. In all cases the Counsellor will discuss both the disclosure of abuse and the decision to report with their counselling supervisor.

5.7. **Role of 14-16 Manager**

- 5.7.1. Where young people are on the roll of another education establishment any relevant concerns will be shared with the school's designated safeguarding officer.
- 5.7.2. The 14-16 Manager must be informed when a child protection / safeguarding issue concerns a pre-16 learner. The 14-16 Manager will contact the Head Teacher in such circumstances

without delay ensuring that the designated person is kept fully informed.

5.8. Work Placement and Work Based Learning

- 5.8.1. Employers and training organisations will be asked to cooperate with the College in putting in place and subscribing to appropriate safeguarding arrangements and checks on employees as consistent with those in place within the College, and following DBS guidelines.
- 5.8.2. For all work experience placements, as indicated in the work experience policy, the College will ensure that additional safeguards are in place, these include ensuring those staff arranging placements have undergone relevant training
- 5.8.3. Training organisations will be asked to make a commitment to safeguarding learners' welfare by endorsing an agreed statement of principles.
- 5.8.4. All learners on work experience placement or work place learning will have a regular point of contact within College, and be advised that they can discuss with that person any concerns about their placement. Any concerns raised about their work placement or any suspicions of abuse must be reported to a designated member of the safeguarding team immediately and procedures followed as outlined.

5.9. Partnership with Parents and Carers

- 5.9.1. The College shares a purpose with parents/guardians/carers to keep children safe from harm and to have their welfare promoted. The College is committed to:
 - 5.9.1.1. Working with parents positively, openly and honestly. It ensures that all parents are treated with respect, dignity and courtesy. It respects parents/guardians/ carers' rights to privacy and confidentiality and will not share sensitive information unless permission has been given, or it is necessary to do so in order to protect a child/young person/vulnerable adult.
 - 5.9.1.2. Sharing with parents/guardians/carers any concerns about their child/young person unless to do so may place a child at risk of harm.
 - 5.9.1.3. Encouraging parents/guardians/carers to discuss any concerns they may have with one of the designated safeguarding team or tutors.

5.10. **Keeping Children and Adults at Risk Informed and Involved**

- 5.10.1. The views of the child or adult at risk should be taken into account throughout the process of dealing with a safeguarding matter. The Designated Safeguarding Officer will keep the person informed while the matter is within the jurisdiction of the College and will provide support as required. Learners will be provided with information on the College's Safeguarding Children, Young People and Vulnerable Adults Policy and Procedures in appropriate College publications.

6. **Safeguarding Learners on College Trips/Residentials**

- 6.1. All adults accompanying learners on visits or residential trips must have undergone an enhanced DBS as part of the College's safeguarding procedure.
- 6.2. Any adults who are not employed by the College who accompany learners on visits/trips must have an enhanced DBS.
- 6.3. Any child protection or safeguarding issue that is disclosed whilst off College premises must be recorded and dealt with in line with the College's procedure and immediately forwarded to the Head of Learner Services (Bristol campuses) or the Deputy Head of Learner Services (Stroud campus) for further action.

7. **Prevent Duty Guidance (1 July 2015)**

- 7.1. The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST (Protect, Prepare, Pursue, Prevent). The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to "prevent people from being drawn into terrorism".
- 7.2. Extremism definition based upon that found in the Prevent strategy: *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs."*
- 7.3. Counter Terrorism and Security Act 2015 received Royal Assent on 12 February 2015 - under the act there is a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism.
- 7.4. Commencement of the Prevent duty as of 1 July 2015 within the Counter Terrorism and Security Bill.

- 7.5. To place a statutory duty on publicly funded and private FE colleges to have regard to the risk of people being drawn into terrorism. Thus, this new duty requires the College to safeguard learners from this risk.
- 7.6. **Statutory Duty on FE Colleges**
- 7.6.1. Active engagement of governors, managers and leaders with partners including the Police, local authority and Prevent coordinators. [This will be overseen by the Designated Safeguarding Lead, and implemented by the safeguarding team.]
- 7.6.2. Internal and external information sharing arrangements for extremism related concerns, a single point of contact for Prevent related activity and if appropriate an internal college Channel panel (Appendix 1). [This will be led by the Designated Safeguarding Lead, delegated to the Deputy Designated Safeguarding Officer , and implemented by the safeguarding team.]
- 7.6.3. Clear policies that outline the risks of learners and staff being drawn into terrorism, together with awareness raising training for staff. [All relevant policies are updated to place due regard to the Prevent Duty.]
- 7.6.4. Policies and procedures to manage the use of college premises for events and any external groups or visitors coming on site (Appendix 2). [All relevant policies and procedures are updated as required.]
- 7.6.5. Policies to cover the use of sub-contractors for any course delivery to ensure extremist organisations do not receive funding. [All relevant policies and procedures are updated as required.]
- 7.6.6. A risk assessment should be carried out, with any risks highlighted being managed through an action plan and discussed with FE/HE Prevent Co-ordinator. [Risk assessments are in place as required.]
- 7.6.7. Staff to receive training in order to understand how and why people are drawn into extremism, to recognise vulnerability and know what action to take in response. [Relevant training is in place.]
- 7.6.8. Sufficient pastoral care or chaplaincy support available for all students and policies relating to the use of prayer rooms and other faith-related facilities. [Pastoral and chaplaincy support is available.]

- 7.6.9. Ensure that the Prevent Duty is enshrined within policies and procedures relating to IT and Safety Online. [All relevant policies and procedures are updated as required.]

8. Confidentiality

- 8.1. SGS College recognises that all matters relating to child protection need to be handled sensitively but confidentiality should not be promised.
- 8.2. The Principal or Designated Child Protection person will disclose any information about a learner to other members of staff on a 'need to know' basis only.
- 8.3. All staff must be aware that the College has a professional responsibility to share information with other agencies in order to safeguard children, young people and vulnerable adults.
- 8.4. All staff must be aware that they cannot promise a young person or vulnerable adult to not disclose something which might compromise that person's safety or wellbeing.
- 8.5. The College will undertake to refer a young person to Social Care with their parent/carers unless to do so could put the young person at greater risk of harm, or impede a criminal investigation. If in doubt, the Designated Person will consult with one of the Local Social Care team where the child lives or the Local Authority Designated Officer (LADO).

9. Record Keeping

- 9.1. Nominated Designated Safeguarding Officers will ensure that electronic records are kept securely within the My Concern software in accordance with the Data Protection Act and best safeguarding practice.
- 9.2. Archived Records will be held for a minimum of 25 years within the My Concern database.

10. Related Legislation, Guidance, Policies and Procedures

- 10.1 The Children's Act 2004 (Sections 11 and 16)
- 10.2 Keeping Children Safe in Education – Statutory guidance for schools and Colleges (Updated Annually)
- 10.3 Prevent Duty Guidance (1st July 2015) – Counter Terrorism and Security Act 2015

- 10.4 The South West Safeguarding and Child Protection Procedures
- 10.5 SGS Acceptable Facilities Usage at WISE guidelines
- 10.6 SGS Guidelines on the use of Photographic and Visual Media
- 10.7 SGS Guidelines for External Speakers
- 10.8 'What To Do If You Are Worried a Child is Being Abused' – Advice for Practitioners (March 2015)
- 10.9 Ofsted Inspecting safeguarding in early years, education and skills settings (August 2015)
- 10.10 Information sharing – advice for practitioners providing safeguarding services to children, young people, parents and carers (March 2015)
- 10.11 Bristol, South Gloucestershire and Gloucestershire Local Safeguarding Children Board Threshold Guidance (February 2014)
- 10.12 Working Together to Safeguard Children – a guide to inter-agency working to safeguard and promote the welfare of children (March 2015)
- 10.13 SGS Learner Charter and Code of Conduct
- 10.14 SGS Staff Guidelines on Maintaining Professional Boundaries & Staff Disciplinary Policy
- 10.15 SGS Abuse of Trust Policy
- 10.16 Safeguarding Vulnerable Groups Act 2006
- 10.17 SGS Learner Anti-Bullying and Harassment Policy
- 10.18 SGS Safeguarding Children, Young People and Vulnerable Adults Policy