PROVISIONS

1. Nature of Safeguarding Policy for Employees/Volunteers/Students
This policy is to inform staff, parents, volunteers, employers, partners and stakeholders about the college’s responsibilities for safeguarding. The purpose is to enable everyone to have a clear understanding of how these responsibilities should be carried out and forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the College.
For further information about sexual or other kinds of harassment, Employment Conditions, the Safety and Security Procedure Protocol and the Security Policy may give further insight.

2. Definition of Safeguarding
The term “safeguarding” describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect employees/volunteers/students from any potential harm or damage.

Safeguarding means:
• Protection from abuse and neglect
• Promotion of health and development
• Ensuring safety and care

In order to retain necessary flexibility in the implementation of policies and procedures, Anatolia College reserves the right to change, revise, or withdraw any of the policies and/or benefits described here. The only recognized deviations from the stated policies are those authorized and signed by Anatolia’s President and the Board of Trustees.

3. Safeguarding Procedure for Employees/ Volunteers/ Students

Definition of Vulnerable Groups
• Employee: The term “employee” describes an individual at the age of 18 years or over who works part-time or full-time under a contract of employment with Anatolia College and has recognized rights and duties
• Volunteer: The term “volunteer” describes an individual under or over the age of 18 years who actively takes on a task, responsibility, or project of Anatolia College under supervision and is not paid for the work that he/she provides. Volunteers may be Anatolia students or individuals who participate in internships, financial aid or fellowship programs.
• Student: The term “student” is defined as any person, male, female or of other gender identities under or over the age of 18 years who attends any of Anatolia’s academic or non-academic programs.
Categories of Abuse

- **Financial or material abuse** - including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

- **Physical abuse** - including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.

- **Neglect and acts of omission** - including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

- **Sexual abuse** - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.

- **Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

- **Organizational abuse** – such as through neglect or poor professional practice as a result of the structure, policies, processes and practices within the organization.

- **Discriminatory abuse** - including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

- **Self-neglect** - covering a wide range of behavior such as neglecting to care for personal hygiene, health or surroundings and includes behavior such as hoarding.

- **Domestic abuse** - including psychological, physical, sexual, financial, emotional, or so-called “honor”-based violence.

- **Modern slavery** - encompasses slavery, human trafficking, forced labor and domestic servitude. Trafficking and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

All employees/volunteers/students at Anatolia College have to care and report when identifying any other employees/volunteers/students that may be experiencing or at risk of experiencing abuse or harm at Anatolia College or elsewhere and take the relevant action to ensure their safety. This includes all staff reporting allegations of abuse against another member of staff as set out in the procedures.
The Anatolia College acknowledges that information concerning abuse provided to staff is a sensitive and crucial issue so as to identify welfare concerns and indicators of possible abuse at an early stage.
It is not the responsibility of any member of staff at the College to investigate suspected cases of abuse; rather all cases that take place within the College must be referred to the HR Director in case of an employee or volunteer and to the Dean/Director of the Program in case of a student. The HR Director or the Dean/Director of the Program will decide if external referrals are required and inform the VP of the area. In case of the absence of the HR Director the deputy safeguarding lead is the HR Officer. In case of the absence of the Dean/Director of the Program the deputy safeguarding lead is the deputy Dean/Director of the Program.

The Anatolia College wants all learners to feel confident that their concerns will be taken seriously and that disclosures to any member of staff will be treated in a sensitive manner.

4. Responsibilities of College Staff
The College ensures that the staff is checked for criminal convictions before hiring. Staff undertakes training on an annual basis to ensure that they are kept up-to-date with all of Anatolia’s policies and procedures. Furthermore, the College circulates the existing and new policies from time to time including the safeguarding policy so as to remind the staff about the existing policies and inform them about the new. All College staff have a responsibility to provide a safe environment in which individuals can learn and develop themselves. Staff are particularly well placed to observe outward signs of abuse, changes in behavior and failure to develop because they have daily contact with children. Temporary staff and volunteers will be made aware of the safeguarding policies and procedures by Human Resources Office and the relevant manager, including the Safeguarding Policy and Employment Conditions Policy. Staff should consider how students may be taught about safeguarding, including online and through teaching and learning opportunities, as part of providing a broad and balanced curriculum. Staff are advised to maintain an attitude of “it could happen here” where safeguarding is concerned. When concerned about the welfare of a student, staff members should always act in the interests of that student.
When an employee/volunteer has made a disclosure of abuse or a staff member has concerns about abuse, no contact should be made with any other member without consultation with the HR Director.
Where a student has made a disclosure of abuse or a staff member has concerns about abuse, no contact should be made with any other member without consultation with the Dean/Director of the Program.

A support plan will be made and monitored by the HR Director or the Dean/Director of the Program in case of a simple issue. Simple issues include information, guidance and support provided in concerns where there is no immediate risk of significant harm. In any other case in which there is immediate risk of significant harm, the Administration of the college should be informed by the HR Director or the Dean/Director of the Program in order to proceed to immediate action so as to protect the individual. If this is the case, support of legal advising and/or medical assistance is involved.
5. **Actions to be taken in case of suspicion that an employee/volunteer/student is being abused or harmed:**

You may have concerns that an employee/volunteer/student is experiencing abuse because of their behavior or changes in their presentation or that they are missing from the College.

*If you suspect that an employee/volunteer is being abused or harmed:*

1. Discuss the issue with the HR Director in a private area. If the HR Director considers it a safeguarding issue, then he/she shares concern with the VP of HR.
2. Staff receiving safeguarding concerns should not investigate or attempt to resolve the concern. All external referrals should be made by the HR Director. The HR Director will keep the employee/volunteer informed of the safeguarding outcome.

*If you suspect that a student is being abused or harmed:*

1. Discuss the issue with the Dean/Director of the Program in a private area. If the Dean/Director of the Program considers it a safeguarding issue, then he/she shares concern with the VP of a certain area and if necessary with the College Counselor or Doctor of the school.
2. Staff receiving safeguarding concerns about students should not investigate or attempt to resolve the concern. All external referrals should be made by the Dean/Director of the Program. The Dean/Director of the Program will keep the student informed of the safeguarding outcome.

*If you are an employee/volunteer and are being abused or harmed:*

1. Discuss the issue with the HR Director in a private area. If the HR Director considers it a safeguarding issue, then he/she shares concern with the VP of HR.
2. Staff receiving safeguarding concerns should not investigate or attempt to resolve the concern. All external referrals should be made by the HR Director. The HR Director will keep the employee/volunteer informed of the safeguarding outcome.

*If you are a student and are being abused or harmed:*

1. Discuss the issue with the College Counselor or Doctor in a private area. If the Counselor or Doctor considers it a safeguarding issue, then he/she shares concern with the Dean/Director of the Program.
2. A support plan will be made and monitored by the Dean/Director of the Program in case of a simple issue. Simple issues include information, guidance and support provided on concerns where there is no immediate risk of significant harm.
3. All external referrals and communications should be made by the Dean/Director of the Program. The Counseling Office will keep the student informed of the safeguarding outcome.

6. **Actions to be taken in case an employee/volunteer informs another employee that he/she experiences/experienced harm/abuse:**

If an employee/volunteer shares with you that he/she had/has an experience of harm/abuse:
1. Respond calmly and listen carefully to what he/she is telling you. Try not to appear shocked or show disapproval. It can be very difficult for someone to talk about their own abuse.
2. Explain you cannot keep total confidentiality on such matters and that you may need to speak to the HR Director.
3. Do not discuss the disclosure with anyone other than the HR Director and only if the employee/volunteer allows you to.
4. Try to find a quiet area to speak where you will not be interrupted. Do not put him/her off talking by asking him/her to meet later.
5. Encourage the employee/volunteer to talk to the HR Director about the incident.
6. An employee/volunteer may disclose information that leads to concerns that another person is experiencing abuse. You must inform the employee/volunteer that you will need to tell the HR Director and encourage him/her to do the same.
7. You may be contacted by the HR Director requesting information from you about an employee/volunteer who has discussed with you an incident of abuse/harm.
8. If you continue to be concerned about the employee/volunteer after you have informed the HR Director, contact the HR Office again to let them know.

7. Actions to be taken in case a student informs an employee that he/she experiences/experienced harm/abuse by an employee:

If a student shares with you that he/she had/has an experience of harm/abuse:

1. Respond calmly and listen carefully to what he/she is telling you. Try not to appear shocked or show disapproval. It can be very difficult for someone to talk about their own abuse.
2. Explain you cannot keep total confidentiality on such matters and that you may need to speak to the College Counselor/Doctor.
3. Do not discuss the disclosure with anyone other than either the College Counselor or Doctor and only if the student allows you to.
4. Try to find a quiet area to speak where you will not be interrupted. Do not put him/her off talking by asking him/her to meet later.
5. Encourage the student to talk to the College Counselor/Doctor about the incident since it is the only way it can be solved.
6. A student may disclose information that leads to concerns that another student is experiencing abuse. You need to inform the student that you will need to tell the College Counselor and encourage him/her to do the same.
7. You may be contacted by the College Counselor/Doctor requesting information from you about the student who has discussed with you an incident of abuse/harm.
8. If you continue to be concerned about the student after you have informed the College Counselor/Doctor, contact the College Counselor/Doctor again to let them know.

In case of reporting, the individual should fill in the Safeguarding Reporting Form (Appendix 1). This policy includes an easy to follow flowchart for staff and students (Appendix 2).
Appendix 1

*Safeguarding reporting form*

This form should be used to record safeguarding concerns relating to employees/volunteers/students.

In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the Designated Safeguarding individual within one working day or the next working day if it's a weekend.

The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

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<th>Your details-the person completing the form</th>
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| 3 | Details of the person affected             |


Appendix 1

4 Other present or potential witnesses
   Name
   Address
   Telephone number

5 Additional relevant information (please detail anything else that you believe to be helpful or important)

I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

Print Name __________________________ Signature __________________________

Date ________________________________
IS THE EMPLOYEE/VOLUNTEER AT RISK OR IMMEDIATE DANGER? AND/OR HAS A CRIME BEEN COMMITTED?

CONTACT THE HR DIRECTOR OF THE PROGRAM FOR ADVICE, THEN REPORT THE INCIDENT BY FILLING IN THE SAFEGUARDING REPORTING FORM

CONTACT EMERGENCY SERVICES e.g. DIRECTOR OF SECURITY AND SERVICES AND/OR POLICE/FIRE/AMBULANCE

SAFEGUARDING EMPLOYEE/VOLUNTEER ISSUE CONFIRMED?

DOCUMENT ALL DISCUSSION HELD, ACTION TAKEN AND DECISION MADE INCLUDING WHO WAS INFORMED AND SPKEN TO. ALL INFORMATION TO BE PASSED TO DESIGNATED PROFESSIONAL FOR SAFEGUARDING ON NEXT WORKING DAY

REFERRAL TO ADMINISTRATION SO AS LEGAL ACTION AND SOCIAL CARE ACTION TO BE TAKEN AND THEN REPORTING TO THE BOARD OF TRUSTEES

APPENDIX 2
IS A STUDENT AT RISK OR IMMEDIATE DANGER? AND/OR HAS A CRIME BEEN COMMITTED?

NO

CONTACT THE COUNSELOR OR DOCTOR FOR ADVICE, THEN REPORT THE INCIDENT BY FILLING IN THE SAFEGUARDING REPORTING FORM

NO

SAFEGUARDING STUDENT ISSUE CONFIRMED?

DOCUMENT ALL DISCUSSION HELD, ACTION TAKEN AND DECISION MADE INCLUDING WHO WAS INFORMED AND SPOKEN TO ALL INFORMATION TO BE PASSED TO DESIGNATED PROFESSIONAL FOR SAFEGUARDING ON NEXT WORKING DAY

YES

CONTACT EMERGENCY SERVICES e.g. DIRECTOR OF SECURITY AND SERVICES AND/OR POLICE/FIRE/AMBULANCE

YES

REFERRAL TO ADMINISTRATION SO AS LEGAL ACTION AND SOCIAL CARE ACTION TO BE TAKEN AND THEN REPORTING TO THE BOARD OF TRUSTEES

APPENDIX 2