

Safeguarding & Prevent Policy & Procedure

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1. Policy Statement

We are committed to ensuring that the wellbeing, and health and safety of staff, learners/apprentices and stakeholders always remains a priority. We fully recognise our legal responsibility and statutory duties and are committed to the protection and support of all individuals, especially those who are vulnerable or at risk.

LAW AND STATUTORY GUIDANCE

This policy is in line with the following Acts and Guidance documents that are in place to protect children, young people, and vulnerable adults:

- Keeping Children Safe in Education 2023
- Working Together to Safeguard Children 2023
- Care Act 2014
- Work based learners and the Prevent Duty Statutory Duty
- Criminal Exploitation of Children and Vulnerable Adults: County Lines
- Counter Terrorism and Security Act 2015
- Ofsted Education Inspection Framework
- Ofsted FE and Skills Handbook February 2023
- Ofsted 2021 Review of Sexual Abuse in Schools and Colleges
- Equality Act 2010
- Children Act 2004
- Safeguarding and Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Human Rights Act 1998
- Children and Families Act 2014
- Modern Slavery Act 2015
- Data Protection Act 2018
- Sexual Offences Act 2003
- Further Education and Higher Education Act 1992
- What to do if you are worried a child is being abused - Advice for practitioners

Appendix 5 provides links to full legislation guidance documents.

2. Policy Review

This policy is reviewed at least annually or on a or risk assessed basis. Updates with changes will be distributed to staff members.

3. Policy Purpose

Safeguarding relates to the responsibility to prevent or respond to potential or actual harm to children or adults at risk whether from crime, other forms of abuse or from being drawn into terrorism, extremism and/or radicalisation type related activities.

We will:

1. At all times and by all means, seek to create a safe environment for staff and learners.
2. Operate the policy to encompass children, young people, and adults at risk.
3. Promote safeguarding, British values, welfare and safety to our staff, learners, employers, and stakeholders.

4. Develop the knowledge, understanding and ability of our learners, employers, and staff to apply British Values, equality, diversity and inclusion within their workplace and everyday lives.
5. Acknowledge that abuse may take many forms: physical abuse, sexual abuse, child on child abuse, emotional abuse, neglect, bullying, radicalisation, and risk to self and/or others which are listed in this policy.
6. Protect children, young people and adults at risk and give individuals the information and tools they need to know how to protect themselves in their day to day lives, including online.
7. Promote positive mental health and wellbeing and highlight what our learners, staff and employers can do to look after their mental health.
8. Work with external agencies, such as Prevent Co-ordinators and Leads, Partnership Boards, Police and/or Social Services whilst always placing the welfare of the individual at the centre of any action taken.
9. Ensure safe recruitment in checking the suitability of staff and volunteers to work with learners.
10. Ensure staff undertake appropriate, and relevant, on-going training and development so that they understand their statutory duties when working with children, young people, and adults at risk.
11. Ensure all staff and learners are aware of and familiar with all safeguarding policies and procedures, and this is included within their induction into the organisation.
12. Ensure safeguarding is promoted and embedded throughout the learner journey, from recruitment through to completion, ensuring safeguarding is embedded throughout the curriculum plans.
13. Employers will be actively engaged and supported in the safeguarding process, responsibilities and expectations are clearly outlined during recruitment and induction processes and highlights during quarterly review meetings. Employers will also be kept up to date by their Skills Tutor via the monthly safeguarding bulletins issued by the safeguarding team.
14. Work in partnership with other agencies, recognising it is essential in promoting the welfare and safety of vulnerable individuals, and that a multi-agency approach will ensure the most suitable care and protection is made accessible.

2. Policy Scope

This policy applies to all staff, learners, employers, and stakeholders. We recognise that all our learners and staff have a right to equal protection from all types of harm or abuse. We recognise that some individuals may be more likely to suffer from abuse or harassment if they consider themselves to have any of the nine protected characteristics defined in the Equality Act 2010.

This policy encompasses the Prevent Duty and Channel. The government has defined extremism in the Prevent Duty as: the promotion or advancement of an ideology based on violence, hatred, or intolerance, that aims to:

- 1) negate or destroy the fundamental rights and freedoms of others; or
- 2) undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- 3) intentionally create a permissive environment for others to achieve the results in (1) or (2).

We recognise that the **Prevent Duty** is not about preventing learners / staff / stakeholders from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways. We consider it our duty to protect all learners and staff from exploitation and radicalisation and to promote the Prevent Duty and the understanding of the Channel process. The designated Prevent lead will liaise

with partners, regional Prevent Officers, and the Local Authorities to keep up to date with local and national threats, policies and procedures relating to Prevent and any changes will be reflected in our Prevent Risk Assessment and Action Plan.

Channel is about early intervention to protect and divert people away from the risk they face before illegality occurs. This multi-agency approach is intended to protect people at risk from radicalisation and uses existing collaboration between local authorities, statutory partners, the police, and the local community to identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk and develop the most appropriate support plan for the individuals concerned.

British Values are defined as:

- Democracy - *society characterised by equality of rights and governments that are representative of the will of the population subject to a free electoral system.*
- Rule of Law - *the principle that all people and institutions are accountable to law that is fairly applied without exception.*
- Mutual respect and tolerance - *permissive attitude toward those whose opinions, beliefs, practices, racial or ethnic origins differ from one's own.*
- Individual Liberty - *the notion that all individuals can freely express themselves through the freedom of speech and lawful actions without interference from the state.*

3. Definition of Safeguarding

The definition of a child in the context of safeguarding is:

A child – is defined as a person who is aged under 18 and includes an unborn child. A child at risk – is a child who: Is experiencing or is at risk of abuse, neglect, or other kinds of harm.

The definition of safeguarding, prevent and promoting the welfare of children and adults at risk covers the following:

- Child on child abuse
- Child criminal exploitation, county lines and gang activity
- Child sexual exploitation and trafficking (CSE)
- Domestic abuse
- Female Genital mutilation (FGM)
- Sexual Harassment and Violence.
- Harmful sexual behaviour
- Cybercrime
- The Prevent Duty, including radicalisation and extremism
- Neglect and acts of omission
- Physical, sexual, emotional, racist, disability and homophobic abuse
- Bullying, including online bullying and prejudice-based bullying
- Gender based violence against women and girls
- Forced marriage and (so called) honour-based violence (HBV)
- Modern slavery and human trafficking
- Financial and material abuse
- Fabricated or induced illness
- Poor parenting
- Homelessness
- Children who are absent from education
- Preventing the impairment of individual health, both physically and emotionally, and wellbeing

- Bullying (including cyberbullying)

The policy covers what actions an employee should take if they happen to encounter a situation that is in breach of the Safeguarding rules.

We use the following definitions for abuse:

Neglect: The persistent or significant neglect of a young person/vulnerable adult, or the failure to protect a young person/ vulnerable adult from exposure to any kind of danger, including excessive heat, cold or starvation, or persistent failure to carry out important aspects of care, resulting in the significant impairment of the young person's/vulnerable adult's health or development, including non-organic failure to thrive.

Physical: Physical injury to a young person/vulnerable adult, whether deliberately inflicted or knowingly not prevented.

Sexual: The sexual exploitation of a young person/vulnerable adult for an adult's or another young person's own sexual gratification; the involvement of young people/vulnerable adults in sexual activities of any kind (including exposure to pornography), which they do not understand; that they are unable to give informed consent to, or that violates normal family roles.

Emotional: Persistent or significant emotional ill treatment or rejection, resulting in severe adverse effects on the emotional, physical and/or behavioural development of a young person/vulnerable adult.

Bullying: Bullying is a highly distressing and damaging form of abuse and must not be tolerated. Through this policy we wish to promote mutual respect and cooperation between staff, learners, parents, and other stakeholders. Certain behaviours are thus deemed to be wholly unacceptable and include:

- Sarcasm
- Put downs.
- Demeaning language and gestures
- Any physical or verbal assault

Discriminatory: Any discrimination including racism, sexism, and all other forms of harassment.

Where learners are working in a group setting, staff are charged with monitoring learners' behaviour and are advised to act promptly on any suspicion or report of bullying behaviour. Complaints of such activity will only be forthcoming where an atmosphere of trust and respect have been previously established.

Further additional information about specific forms of abuse and safeguarding issues can be found in annex B of Keeping Children Safe in Education 2023. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf and **Appendix 3:** Categories of Adult Abuse.

4. Definition of an Adult at Risk

The definition of a vulnerable adult is someone who is :

Aged 18 years or over; Who may be in need of community care 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 or exploitation.

Anyone who is employed or volunteers for us, regardless of the type or amount of contact they have with adults who are at risk of abuse or vulnerable adults, has a role to play in safeguarding and protecting them.

They must:

- Know how to recognise potential abuse of adults at risk/vulnerable adults
- Know what to do when safeguarding concerns arise.
- Understand what is expected of them in terms of their own behaviour and actions

Whilst personal characteristics may make an individual more vulnerable i.e., disability and communication difficulties, it is the situation around an individual which may increase risk or place them at potential risk of harm. It is therefore vital to be open to the possibility that any adult may be at risk and that this can be temporary or on-going depending on the support and protective factors around them.

Key Principles

Our approach to safeguarding adults at risk is based on the following principles:

- All adults have a right to equal protection from all types of harm or abuse, regardless of age, ability, gender, racial heritage, religious beliefs, sexual orientation, or personal characteristics which may indicate additional vulnerabilities.
- The best interests of the child are paramount in all considerations about the safeguarding and protection of adults at risk
- Where concerns are identified, the key principles of working with adults at risk embedded in the Care Act 2014, will inform our approach to interventions at all times
- Where a concern is identified, we must communicate very clearly what we have done and will be doing to safeguard the adult at risk, unless to do so would in any way increase risk to them or a child. Capacity will be assumed unless there is reason to believe that the person cannot understand.
- Where we are working together with adults at risk, their carers, family members and other agencies, it is essential to recognise that, in some limited circumstances, it will not be appropriate to engage with carers or family members in order to protect the adult at risk.
- Concerns or allegations that staff or volunteers have abused or neglected adults will be taken very seriously and managed sensitively and fairly in accordance with this policy, relevant legislation, and local procedures.

For categories and indicators of adult abuse see **Appendix 3**.

5. Aims of Safeguarding

The main aims of our Safeguarding policy are:

- To ensure that appropriate measures and practice to safeguard and promote the welfare of children and adults at risk are in place and bring matters requiring attention to a Designated Safeguarding Leads (DSL) or Deputy DSL. This includes those under the care and responsibility of the adults who receive our services.

- All staff, learners and employers have a good understanding of safeguarding concerns, the Prevent Duty, including potential abuse and possible radicalisation of children, young people, adults at risk which may become known in the workplace.
- Staff, and those who undertake work on our behalf, maintain a strong focus on safeguarding children, young people, and adults at risk.
- Staff recognise, identify, and respond to signs of abuse and other safeguarding concerns relating to children and adults at risk.
- Staff respond appropriately to disclosure by a child, or vulnerable adult, of abuse.
- Staff respond appropriately to allegations against staff, other adults, and against themselves.
- Staff are alert to the risks which abusers, potential abusers, or extremists, may pose.
- Staff contribute as necessary to all stages of safeguarding and protection processes
- Staff undertake the relevant and ongoing training for Safeguarding, including the Prevent Agenda and development to maintain a safe workforce.
- Staff promote and develop learners' understanding of safeguarding, British Values, positive behaviours, and learner wellbeing through teaching and learning activities and through the pastoral support that is provided.
- Risk assessments are completed for safeguarding and the prevent duty and identify local referral agencies, Local Prevent Leads and Local Safeguarding Partnership Boards for both Children and Adults.
- Resources are provided to improve the personal safety of learners, reduce the likelihood of radicalisation and to improve their awareness of these issues through curriculum and training.
- Seek to minimise child on child abuse through safeguarding and pastoral support and teaching and learning activities. Information is provided on resources such as our safeguarding bulletin and within training on how to spot types of child-on-child abuse and effective ways to tackle it.
- Emergency contact details for learners are collected on the application form if we ever need to contact in the event of a concern.

6. Recruitment Activity & Safeguarding

Where appropriate, the recruitment procedure ensures that from the identification of a vacancy through to the selection and the formal offer of a contract, applicants are aware of the requirements of disclosure checks and the company safeguarding policies.

Applicants are required to self-disclose all previous convictions and cautions (spent and unspent) on the application form so consideration to suitability can be assessed at the earliest opportunity.

Identity and right of work checks are undertaken, along with professional qualifications and an Enhanced DBS check where relevant, depending on roles within the organisation.

A Single Central Record of all staff DBS numbers is maintained.

All staff as part of induction will be informed of the process to follow if they have a safeguarding concern, DSL contacts and confirm they have received, read, and understood their safeguarding responsibilities and the process for reporting concerns.

7. Responsibilities

The Board has overall responsibility for ensuring that a Safeguarding and Prevent Policy and procedure is in place and for monitoring its effectiveness.

- The Designated Safeguarding Lead's (DSL's) are responsible for overseeing the implementation of the policy and procedure within the organisation, including ensuring that training has taken place and that incidents are reported and acted upon in accordance with procedure and in a timely manner.
- It is the responsibility of all staff and governors to undertake bi-annual mandatory safeguarding training to ensure they keep their knowledge up to date and send copies of certificates to the Deputy DSL for recording on central record.
- The DSL's are responsible for informing the relevant social services department of concerns over the suspected abuse or neglect of children, young person, or adults at risk.
- If a member of staff, during their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 it must be reported to the police through safeguarding procedure.

We have a legal responsibility under the Prevent Duty to make sure staff and learners:

- Undertake training in the Prevent Duty
- Are aware of when it is appropriate to refer concerns about learners or staff to the Designated Safeguarding Lead's or Deputies.
- Exemplify British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs into their practice.
- Implement the Channel process if required
- Expectations for behaviour and attendance of learners is outlined in the Learner Induction Booklet which is issued at the start of training. All learners are expected to apply these behaviours throughout their programme. Persistent failure to do so may lead to informing the Sector Operations Manager who hold the right to terminate a learner's programme
- KCSIE: All staff must read and understand the document 'Keeping Children Safe in Education 2023 Part 1' and this Safeguarding Policy and Procedure.
- All staff are expected to raise a concern via the RecordMy system as soon as is possible, or within one working day, if an incident or concern comes to their attention.
- Staff have a responsibility to be aware and alert to signs that all is not well with a vulnerable person. However, they are not responsible for diagnosing or investigating abuse.
- Confidentiality is central to our work and staff disclosing a concern must ensure they do so in a sensitive and confidential manner, informing a DSL via RecordMy or direct contact via telephone.
- We will ensure electronic files containing sensitive or confidential data is stored securely and password protected, known only to the members of the safeguarding team.

8. Bullying, Sexual Harassment & Violence

Bullying and sexual harassment if left unaddressed, can have a devastating effect on individuals. It can be a barrier to effective learning and have serious consequences for their mental health not only affecting an individual during childhood but can have a lasting effect on lives well into adulthood.

Bullying can take many forms (for instance, cyber-bullying via text messages, social media, or gaming, including the use of images and video) and is often motivated by

prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs, or disabilities, or because a child is adopted, in care or has caring responsibilities.

Implement a zero-tolerance approach to sexual violence and sexual harassment and /or bullying we recognise it is never acceptable, and it will not be tolerated within the learning or workplace environment.

Staff should never pass it off as “banter,” “just having a laugh,” “part of growing up” or “boys being boys.”

Staff will challenge any physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising these actions.

Our response to reports of bullying, sexual harassment, violence, and other inappropriate behaviours will be seen as a safeguarding concern and dealt with accordingly.

9. Allegations against a Member of Staff

Staff may be subject to abuse allegations. An allegation may be said to be information which becomes known suggesting that a person who works or volunteers with a child or young person has:

- Behaved in a way that has harmed a child or may have harmed a child .
- Possibly committed a criminal offence against or related to a child.

Concerns may also arise about:

- A person’s behaviour in their personal life may impact upon the safety of the child whom they have a duty of care.
- A person’s behaviour with regards to his/her own children.
- The behaviour in the private or community life of a partner, member of the family or household

A Lead Designated Safeguarding Lead, Senior Manager and Board member will follow the procedures as detailed in Part 4 of KCSIE 2023 and liaise and work with all relevant services such as LADO, social services, police, or Ofsted to assist in the investigation to achieve a safe and fair outcome.

See Procedure for Managing Allegations Against Staff

10. Safeguarding Procedure

Where there is a Child Protection or Safeguarding concern staff must be guided by the following principles:

- Children, young people, and vulnerable adults have a right to be safe and should be protected from all forms of abuse and neglect;
- Safeguarding is everyone’s responsibility;
- It is better to help children, young people, or adult at risk as early as possible, before issues escalate and become more damaging;
- Children and families are best supported and protected when there is a co-ordinated response from all relevant agencies
- Staff maintain an attitude of “it could happen here”

A concern regarding abuse usually falls into one of the three categories listed below:

- A child, young person or adult at risk discloses abuse
- A third party reports a child, young person or adult at risk is being abused
- There are signs and indicators which point to abuse, these may be observed over a period of time or be a single incident.

Reporting and responding to concerns for the safety and welfare of a child, young person, or adult at risk.

If you think there is immediate danger call for police assistance.

Where there is a concern a Sector or Lead Designated Safeguarding Lead or in their absence a Deputy Safeguarding Lead, should be informed immediately, they will then:

- Ensure the concern is acted upon immediately within the same working day. Determine the most appropriate course of action:
- Where the concern reveals a risk of significant harm or the learner is in immediate danger, the DSL will follow the Local Safeguarding Partnership Board safeguarding procedures (within the local authority in which the learner resides) and refer the matter immediately to the police and /or local social care services departments.

There are several possible outcomes to a referral to Children's Social Care (CSC).

- If the concerns meet thresholds for intervention CSC will begin an assessment (section 17 Child in Need or section 47 Child Protection). It maybe that the DSL or staff member maybe asked to be involved with this assessment.
- Where the risk is considered less serious, a referral for an Early Help assessment maybe made. This maybe a multi-agency response, and staff may be asked to have some input into this process.

Where it is felt that the concern does not meet thresholds for statutory involvement.

- The needs of the learner can be best supported and monitored in house with pastoral support.
- If at any time during internal support those involved consider the risk or concerns for the learner is increasing, the matter must be escalated and a referral to social care services and /or police is made.
- If a staff member believe that their referral has not been dealt with sufficiently or appropriately, they have the right to refer this to another DSL or senior member of staff or to the local social services department themselves.

See **Appendix 1 Procedure for raising a safeguarding concern**

Workplace concerns:

- If a safeguarding concern arises within the workplace, these concerns **must** be raised with the line manager/DSL within the workplace following their safeguarding procedures.
- The concern **must** also be raised a Sector or Lead DSL or Deputy DSL, who will then liaise with the workplace DSL/manager in regards to the response to the concern.

Raising a concern:

- A written record of welfare concerns or a disclosure of abuse should be made as soon as possible or within one working day of the concern being raised via RecordMy, however, this should not delay taking action to ensure the learner is safe and well.
- Concerns can initially be discussed with sector or lead DSL or deputy directly; a safeguarding or screening form (BD team) form **must** then be submitted via RecordMy within one working day of the discussion.

Dealing with a disclosure of abuse

If a learner talks about possible abuse, the member of staff should:

- Try to react calmly, never ever go, and get another person to listen to the disclosure instead of you, there is a reason this child, young person or vulnerable adult has chosen you to make the disclosure to.
- Remember the child, young person or vulnerable adult will be anxious or frightened and even intimidated.
- Confirm to the child, young person, or vulnerable adult they have not done anything wrong. They are right to speak up and are not to blame.
- Listen carefully and treat the information you are being given seriously. Do not ask direct questions. Avoid Who? What? When? Where?
- Encourage the child, young person, or vulnerable adult to talk; do you want to talk about this? Never apply pressure on him/her.
- Do not prevent the child, young person, or vulnerable adult from recalling events, your role is to listen and make detailed notes of the conversation as soon as possible after the disclosure.
- Reassure the individual but do not promise confidentiality, explain you will need to pass the information on to someone else who will be able to help – always let them know who this person is and only people who need to know will be given the information disclosed.

The member of staff should NOT:

- Panic
- Allow their shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions about what has happened
- Make negative comments regarding the alleged abuser
- Approach the alleged abuser
- Make any promises that you cannot keep, e.g., 'everything will be all right'
- Agree to keep the information given secret, explain you may need to share this information to ensure they are kept safe and well.
- Delay getting emergency help if needed, e.g., medical help

When the learner has finished, make a detailed note on the "Logging a Concern" form, including the date, time, place, what was said and what happened, sign and date the form, if any other member of staff is present they should also sign the form, following the procedure detailed above.

If a third party reports a child, young person or adult is being abused the incident form should also be completed with the third party and the information given to the Safeguarding Lead /Deputies who will then follow the relevant company procedure, following the procedure detailed above.

11. Identifying needs early

Early Help is about acting as soon as possible to tackle problems or concerns for a learner's health and wellbeing before they can grow into something that is more difficult to overcome, identifying additional needs early reduces the risk of difficulties escalating by providing learners with timely and effective support.

Signs that a young person or adult may benefit from early help include:

- displaying disruptive or anti-social behaviour
- being bullied or bullying others
- having work poor attendance
- having poor general health
- having anxiety, depression, or other mental health issues
- misusing drugs or alcohol
- having a particularly challenging relationship with parents or appearing to be unusually independent from their parents
- experiencing difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems.

These may be signs and indicators which point to abuse or concerns for their health and wellbeing and may be observed over a period of time or be a single incident.

12. Sector Designated Safeguarding Leads responsibilities

It is the responsibility of the Sector Designated Safeguarding Leads to:

Manage referrals:

- The designated safeguarding lead is expected to:
- ensure safeguarding referrals are acknowledged and responded to within one working day of being received .
- follow local safeguarding procedures and refer cases of suspected abuse to the local authority where the learner resides, children's social care or adult services as required.

Work with others:

The DSL's will:

- as required, liaise with the case manager and the designated officer(s) at the local authority for child protection or adult at risk concerns and
- Liaise with staff on matters of welfare, safety and safeguarding when deciding whether to make a referral.
- Act as a source of support, advice, and expertise for staff.

Ensure Information is be kept confidential and stored securely, records should include:

- Comprehensive reflection all contacts, actions, discussions held in relation to the concern. Detailing how the concern was followed up and resolved decisions reached and the outcome.
- Be recorded in a timely manner, as soon after taking place as possible

It is the responsibility of the Lead DSL's and Deputies:

- To support, advise and provide guidance to Sector DSL's when dealing with concerns to ensure appropriate and timely action is taken.

- To deal with cases of allegations against staff and liaison and work with all relevant services such as LADO, social services, police, or Ofsted to assist in the investigation to achieve a safe and fair outcome.
- A Lead DSL will take responsibility for the oversight and maintenance of the Single Central Register and ensuring safer recruitment practices are effective and implemented correctly.

Training:

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The designated safeguarding lead will undertake Prevent awareness training.

In addition to the formal training, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to and understands the organisations safeguarding procedures
- are alert to the specific needs of learners in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting learners from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children, young people, and vulnerable adults and taking account of their wishes and feelings, among all staff, in any measures which may put in place to protect them.

Raise Awareness:

The Lead Designated Safeguarding Leads will:

- ensure the safeguarding policies are known, understood, and used appropriately;
- ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this.
- ensure this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made
- link with the Partnership Boards to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

13. Training

We ensure all staff and governors complete mandatory Safeguarding Adults and Children training as part of their induction. This also includes Prevent, Channel, ACT and WRAP and is designed to ensure all staff:

- Understand the organisations safeguarding systems.
- Their responsibilities.
- They can identify any signs of abuse, neglect, exploitation, or radicalisation and in adults and young people.
- Know how to respond and report concerns.
- Are kept up to date with current and changing safeguarding trends, their mandatory safeguarding training is monitored and updated when needed.

We are committed to updating safeguarding training for all staff annually, and more regularly as required, through CPD, monthly safeguarding bulletins, using the skills and knowledge of local partners and staff members.

To achieve this:

- Time will be given to enable this commitment to be met as part of each member of staff CPD schedule
- All new staff and learners will attend appropriate safeguarding training as part of their induction.
- Monthly updates will be provided by the safeguarding team.

All board members will be sufficiently trained at board level and members of the Senior Management Team and the Safeguarding Team will be trained at Level 3 DSL which will be renewed every 3 years as a minimum.

Training for Learners:

Learners will be informed about the importance of British Values from induction through to progress reviews and this will be embedded across our broad and balanced curriculum/s within a diverse range of learning activities and accessible resources.

Our curriculum intent is to encourage a positive caring attitude towards others, to understand others social and cultural traditions, and to support appreciation of the diversity of other people's cultures and beliefs.

Learners will complete the Education and Training Foundation 'Side by Side' training as part of their induction process which covers the following:

- Radicalisation and Extremism
- Staying Safe Online
- What Can You Trust?
- British Values

As part of their induction into the organisation, learners will be issued with Safeguarding Activity Handbook and British Values Handbook.

The main aim of the booklets is to ensure learners are aware, have a good understanding, are engaged and vigilant about safeguarding concerns, this includes issues and risks associated with radicalisation.

The booklets are embedded into the personal learning plan of each learner, ensuring that safeguarding remains a priority throughout their learner journey.

Monthly support visits and quarterly progress reviews will also focus on Safeguarding and Prevent to continue to develop the learners' knowledge and awareness of risks associated in their everyday lives and know how to keep themselves safe.

14. Monitoring

The review of this policy is embedded in our overall quality improvement processes and cycle:

The Safeguarding team will keep up to date with statutory guidance and ensure updates are included in the policy and issued to the board to approve before issuing to staff and learners where applicable.

- Monthly monitoring by external Governor via safeguarding reports from DSL/Safeguarding team.
- The Safeguarding Team will review and update the working of this policy annually or on a risk assessed basis.

15. Related Documents

- LEARNER INDUCTION
- SAFEGUARDING ACTIVITY BOOKLET
- BRITISH VALUES HANDBOOK

16. Appendix 1: Procedure for Responding to Safeguarding Concerns

Procedure for member of staff if they have a concern for a young person or adult:

- If learner is at risk of significant or immediate harm, contact police immediately also informing a Designated Safeguarding Lead (DSL)
- Complete a Safeguarding form or Pre-Screening form via RecordMy within 1 working day of concern raised or contact Sector DSL for advice and guidance.
- If EHCP/Social Services Involvement or Young Person Looked After referring to Claire Baxendale for learners on the Woodspeen Contract and Gina Stephens or deputies for learners on the Jarvis Contract
- Business Development / Admin staff will report concerns relating to learners' and employers to the sector DSL.
- Any concern relating to a staff member should be reported to Samantha Wilson / Claire Baxendale / Gina Stephens

Designated Safeguarding Leads

<p>Gina Stephens Lead DSL (Woodspeen & JTM) Gina.stephens@jarvis-eu.com 07867 260 276</p>	<p>Claire Baxendale (Lead DSL) Adult Care and Optical / All sectors Claire.baxendale@woodspeentraining.co.uk 07538207314</p>	<p>Janine Ridley Deputy Lead DSL (Woodspeen & JTM) Janine.ridley@jarvis-eu.com 07771 672 491</p>
<p>Tom Sumnall Prevent Lead and Deputy Lead DSL (Woodspeen & JTM) Tom.sumnall@jarvis-eu.com 07741 743618</p>	<p>Claire Fairhurst Early Years and Childcare Claire.fairhurst@jarvis-eu.com (JTM) Claire.fairhurst@woodspeentraining.co.uk (Woodspeen) 07775950929</p>	<p>Sian Jones Loans - Beauty Sian.jones@woodspeentraining.co.uk (Woodspeen) Sian.jones@jarvis-eu.com (JTM) 07590663475</p>
<p>Jeannette Adrian Pharmacy (Woodspeen) Jeannette.adrain@woodspeentraining.co.uk 07483367410</p>	<p>Donna Thomas Business (Woodspeen) Donna.thomas@woodspeentraining.co.uk 07938602470</p>	<p>Claudette Duhaney AEB (Woodspeen) Claudette.duhaney@woodspeentraining.co.uk</p>

Possible Actions/ Outcomes of Concern

Sector DSL will:

- Acknowledge and respond to concern within 1 working day.
- Liaising with a Lead DSL or deputy as to action to be taken.
- Discuss concern with referrer and if needed external agencies to gather further information and decide required action.
- Record all contacts and actions are recorded on RecordMy in a timely way.

Concern meets statutory thresholds and escalation to Children's Social Care Services or Adult Services is required.

With support and advice from Lead DSL or deputy:

- Sector DSL to make referral to Children's or Adults Social Care Services to the LA that the learner resides.
- Sector DSL to act as single point of contact.
- Follow up within 24 hours to be made if no response from referral.
- Sector DSL to be involved in multi-agency assessments, support plans and meetings.

OR

Concerns do not meet thresholds for escalation to statutory services, therefore internal help, support, and monitoring could be provided.

Internal planning meeting held to discuss needs and identify support plan, this may involve:

- DSL
- Pastoral
Coordinator
- Skills Tutor
- External support agencies as appropriate.
- Learner /parent /carer/employer as appropriate

Delivery of support plan, review / monitor 4-6 weekly involving personnel named above.

Escalate to Children's / Adult Social Care services if needs / risks escalate.

17. Appendix 2: Guidance for completing Cause for Concern Forms

Points to consider and possible example questions

Ensuring there is a clear understanding of the concern – both the risks and the strengths of the learner, is dependent on asking good questions.

Gaining comprehensive information which enables us to fully assess and respond to the concern in an appropriate and timely way is important, below are a points for you to consider and possible questions you may ask when having discussions with the learner and completing the form. For learners who are also parents, particularly of children under 18 years old , it is important that we have some understanding of how the worry or concern maybe impacting on their children and wider family members and so some of the points reflect this.

What are we worried About?	What's working well?
<ul style="list-style-type: none"> ▪ What are you worried about? ▪ What have you seen/ heard that worries you? ▪ How do you know? ▪ What evidence do you have? ▪ What harm has happened to the learner? ▪ What do you think most worried the learner? ▪ How do they feel about this? ▪ Does the learner feel safe, are they living in a safe environment at home/work /in the community? ▪ Is there anyone you feel scared of ▪ When did the problem happen? ▪ Has it happened before? How often was it? How bad was it? ▪ How did the worry/concern affect the learner? ▪ Has their learning/progress been impacted 	<ul style="list-style-type: none"> ▪ What's working well for the learner? ▪ What do you like about the learner what are his/her best qualities? ▪ How is their learning/work progressing? ▪ Who are the people who care most about the learner, do they have a support network of friends/family? ▪ What does the learner say are the best things about their life? ▪ Have there been times when this problem has been dealt with or was even a little bit better? How did that happen? ▪ When were things good ? ▪ What would the learner need to see that would make them say this problem is completely sorted out? ▪ Who or what has helped the learner most so far? ▪ Exceptions question regarding the concerns, e.g., "Tell me about a time when the problem could have happened but didn't." ▪ When were things worse/better?..... ▪ How did you know things were better then?.....

- Which part of this worries you the most?
- What do you think is the worst thing that could happen because of this problem?
- When did you start to worry about this learner?
- What has changed that has made you more concerned?
- What are you worried will/ might happen if nothing changes?
- What could be the impact of this on the learner?
- Is there anything that has been making this problem harder to deal with?
- Are there things happening in your life or family that make this problem harder to deal with?
- How do you think this is impacting on your children/family.
- What are the first, worst and last times this has happened?
- What were the triggers for this?

- What did that look like to you, tell me more about.....
- When things are good what does that look like to you?
- When things were good - what difference do you think it made to you/your family? How could you tell?
- What do you think is the next step that should happen to get this worry sorted out?
- What would you need this to look like for you not to have to worry?
- Can you think of one small manageable step that would improve things for you?
- What would be happening if things were working better for you
- Tell me about what a good day looks like for you? What makes it a good day?
- What are you most proud of in your life?

18. Appendix 3: Categories of Adult Abuse

Reference: Care and Support Statutory Guidance (2018)

What constitutes abuse and neglect?

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour which could give rise to a safeguarding concern.

We should not limit our view of what constitutes abuse or neglect, as they can take many forms and the circumstances of the individual case should always be considered.

Exploitation and abuse of power are common themes in the following list of the types of abuse and neglect.

Physical abuse including:

- assault
- hitting
- slapping
- pushing
- misuse of medication
- restraint
- inappropriate physical sanctions

Domestic violence including:

- psychological
- physical
- sexual
- financial
- emotional abuse
- honour-based violence

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

A new offence of coercive and controlling behaviour in intimate and familial relationships was introduced into the Serious Crime Act 2015. The offence will impose a maximum 5 years' imprisonment, a fine or both.

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
- sexual assault
- 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
- unreasonable and unjustified withdrawal of services or supportive networks

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
- the misuse or misappropriation of property, possessions, or benefits

Financial abuse is the main form of abuse investigated by the Office of the Public Guardian both amongst adults at risk and children. Financial recorded abuse can occur in isolation, but as research has shown, where there are other forms of abuse, there is likely to be financial abuse occurring. Although this is not always the case, everyone should also be aware of this possibility.

Potential indicators of financial abuse include:

- change in living conditions
 - of heating, clothing, or food
 - inability to pay bills/unexplained shortage of money
 - unexplained withdrawals from an account
 - unexplained loss/misplacement of financial documents
 - the recent addition of authorised signers on a client or donor's signature card
 - sudden or unexpected changes in a will or other financial documents
- Modern slavery encompasses:
- slavery
 - human trafficking
 - forced labour and domestic servitude.
 - traffickers and slave masters using whatever means they have at their disposal to coerce, deceive, and force individuals into a life of abuse, servitude, and inhumane treatment

Discriminatory abuse including forms of:

- harassment
- slurs or similar treatment:
- because of race
- gender and gender identity
- age
- disability
- sexual orientation
- religion

Organisational abuse including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.

This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice due to the structure, policies, processes, and practices within an organisation.

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

Self-neglect

This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour.

There may come a point when they are no longer able to do this, without external support.

Incidents of abuse may be one-off or multiple and affect one person or more.

Professionals and others should look beyond single incidents or individuals to identify patterns of harm.

Repeated instances of poor care may be an indication of more serious problems and of what we now describe as organisational abuse.

In order to see these patterns, it is important that information is recorded and appropriately shared.

Patterns of abuse vary and include:

- *serial abuse*, in which the perpetrator seeks out and 'grooms' individuals. Sexual abuse sometimes falls into this pattern as do some forms of financial abuse
- *long-term abuse*, in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- *opportunistic abuse*, such as theft occurring because money or jewellery has been left lying around

Note: This is not an exhaustive list, nor do these examples prove that there is actual abuse occurring. However, they do indicate that a closer look and possible investigation may be needed.

19. Appendix 4: External Support Contact information

<p>Prevention for Young Suicide If you are a young person at risk of suicide or are worried about a young person at risk of suicide: Call: 0800 068 4141 Text: 07860 039967 Email: pat@papyrus-uk.org https://papyrus-uk.org/</p>	<p>Housing / homelessness Shelter Housing and homelessness charity, offering advice and information Tel: 0808 800 4444 http://england.shelter.org.uk/</p>
<p>Bereavement Cruse Provides care to bereaved people Tel: 0808 808 1677 https://www.cruse.org.uk/</p>	<p>Mental Health MIND Advice, support, and information Tel: 0300 123 3393 www.mind.org.uk</p>
<p>ChildLine Children/young people Offers confidential help and support to children and young people Tel: 0800 1111 www.childline.org.uk</p>	<p>Mental Health - BACP (British Association for Counselling and Psychotherapy) Sets standards and provides information about therapeutic practice Tel: 01455 883300 www.itsgoodtotalk.org.uk</p>
<p>Debt, benefits, and rights Citizens Advice Confidential, impartial advice on rights and responsibilities. Search for your local Citizens advice by visiting: www.citizensadvice.org.uk</p>	<p>Sexual / domestic abuse National Domestic Violence Helpline Support service for women experiencing domestic violence, their family, friends, colleagues, and others calling on their behalf Tel: 0808 2000 247 https://www.nationaldahelpline.org.uk/</p>
<p>Step Change – Debt Charity Offers free, anonymous debt advice for people in the UK. Tel: 0800 138 1111 https://www.stepchange.org/</p>	<p>Napac - Sexual / domestic abuse (National Association of People Abused in Childhood) Tel: 0808 801 0331 https://napac.org.uk</p>
<p>Drugs Frank Tel: 0300 123 6600 www.talktofrank.com</p>	<p>Sexual / domestic abuse Stop it now! Supporting adults in the UK to prevent child abuse Tel: 0808 1000 900 www.stopitnow.org.uk</p>
<p>BEAT Eating disorders Support and information relating to eating disorders - sufferers, carers, and professionals. Helpline: 0808 801 0811 (over 18) Youth line: 0808 801 0711 (under 18) https://www.beateatingdisorders.org.uk/</p>	<p>Social isolation Carers UK Help for people who care for family or friends Tel: 0808 808 7777 www.carersuk.org</p>
<p>NHS Help Line for all non-emergency enquiries call 111 Health advice and reassurance</p>	<p>Samaritans Offers confidential, emotional support for all 24/7 in a safe environment Free Phone Tel: 116 123 Email: jo@samaritans.org www.samaritans.org</p>
<p>Old Age Age UK Support for people aged 50 and over Tel: 0800 678 1602 www.ageuk.org.uk</p>	<p>Victims of crime - Victim Support Confidential help to victims of crime, witnesses and their families and friends Tel: 0808 1689 111 https://www.victimsupport.org.uk/</p>

20. Appendix 5: Law and Guidance Documents

- Keeping Children Safe in Education 2023
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf
- Working Together to Safeguard Children 2023
[Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/working_together_to_safeguard_children_2023_statutory_guidance.pdf)
- Care Act 2014
<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>
- Prevent Duty 2023
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- Criminal Exploitation of children and vulnerable adults: County Lines
[Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines)
- Counter Terrorism and Security Act 2015
<https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- Ofsted Education Inspection Framework
<https://www.gov.uk/government/publications/education-inspection-framework>
- Ofsted FE and Skills Handbook
<https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook-eif>
- Ofsted 2021 Review of Sexual Abuse in Schools and College
<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>
- Equality Act 2010
<https://www.legislation.gov.uk/ukpga/2010/15/contents>
- Human Rights Act 1998
<https://www.legislation.gov.uk/ukpga/1998/42/contents>
- Children Act 2004
<https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Safeguarding and Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
- Protection of Freedoms Act 2012
<https://www.legislation.gov.uk/ukpga/2012/9/contents>
- Children and Families Act 2014
<https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>
- Modern Slavery Act 2015
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- Data Protection Act 2018
<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- Sexual Offences Act 2003
<https://www.legislation.gov.uk/ukpga/2003/42/contents>
- Further Education and Higher Education Act 1992
<https://www.legislation.gov.uk/ukpga/1992/13/contents>
- What to do if you are worried a child is being abused - Advice for practitioners
[https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What to do if you are worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/media/5a80597640f0b62302692fa1/What_to_do_if_you_are_worried_a_child_is_being_abused.pdf)