

# Safeguarding/ PREVENT Policy

## Policy Statement

Steadfast Training Ltd is strongly committed to practices that protect children, young people and adults at risk from abuse, neglect, significant harm or radicalisation.

Steadfast the company recognise and accept their responsibility to develop the awareness of the risks and issues involved in Safeguarding. The company also recognises that it has a responsibility to protect staff from unfounded allegations of abuse. Steadfast is committed to working with existing local Safeguarding Boards, Health and Social Care partnerships, Police and the Channel Programme to ensure the safeguarding of its learners. Steadfast will work in accordance with the requirements of the Office of the Public Guardian (OPG) and the Mental Capacity Act 2005, supporting the 6 principles of Empowerment, Protection, Prevention, Proportionality, Partnership, and Accountability.

## Definition

The term “children and young people” refers to “those under the age of 18”, including those who are completing an apprenticeship programme with Steadfast Training Ltd.

In relation to children and young people, Steadfast adopts the definition used in the Children Act 2004, Apprenticeships, Skills, Children and Learning Act 2009 and the Department for Education (DfE) guidance document: Working Together to Safeguard Children 2015 which defines safeguarding and promoting children and young people’s welfare as:

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

**ASCLA** (Apprenticeship, Skills, Children & Learning Act 2009) introduced the requirement for an apprentice to be employed under an apprenticeship agreement, this was established to ensure that 16-18 year olds receive the minimum wage for their age, protected under the working time regulations and work towards a work-based qualification.

## Definition of Safeguarding Adults

The term ‘adult at risk’ is used in this policy to replace ‘vulnerable adult’ in accordance with OPG’s statement, that the term ‘vulnerable adult’ may imply that some of the fault for abuse may lie with the victim of abuse.

It is also recognised that some adults are at risk of abuse. Accordingly, our policy and procedures also apply to allegations of abuse and the protection of Vulnerable Adults Act 2006, the Care Act 2014, Mental Capacity Act 2005, by protection of the Freedoms Act 2012. Guidance on who is an 'adults at risk' is taken from 'No Secrets' (Department of Health 2000), which defines 'adults at risk' as: 'those adults who are or may be in need of community care services by reason of mental illness or other disability, age or illness'.

The definition of 'Adults at risk' (but is not exclusive to) individuals with any of the following:

- Learning Difficulties
- Physical Impairments
- Sensory Impairments
- Mental illness Needs
- Age Related frailty
- Dementia
- Brain Injuries
- Drug or Alcohol Problems
- Domestic Violence

The Mental Capacity Act 2005 (MCA) is a legal framework which protects people who may lack capacity to make decisions for themselves. It also sets out how decisions should be made on their behalf, extra safeguards are needed if the restrictions and restraints used will deprive a person of their liberty. These are called the Deprivation of Liberty Safeguards (DoLS) The presumption is that adults have mental capacity to make informed choices about their safety, how they live their lives and a person's ability to give consent. The Deprivation of Liberty Safeguards (DoLS) are an amendment to the Mental Capacity Act 2005.

Steadfast will adhere to and support all of our learners and employees in accordance with statutory legislation, including '**Clare's Law**' or the **Domestic Violence Disclosure Scheme**.

### **Prevent Duty**

In respect of safeguarding individuals from radicalisation, Steadfast works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

## Accountability and Responsibility

### Duty to report

This Policy applies to all staff, employers and partnership organisations who have a legal responsibility to take seriously any safeguarding issues that come to their attention and follow the procedure as set out in Appendix 1 of this document

- Policy and procedures are issued to all members of staff
- Partners, subcontractors and Employers will be informed of this Policy and be responsible for reporting any concerns reported to them by contacting the Designated Person.
- All learners are referred to this Policy at their induction

Key staff with designated safeguarding responsibilities includes:

- **Managing Director:** To ensure the promotion of ALL Safeguarding throughout the organisation and all partnerships.
- **Designated person** To record, document and act appropriately to ALL safeguarding disclosures
- **Designated officer** To record and instigate an investigation into the Safeguarding incident or concern. To document and disclose timely to the Local Multidisciplinary team.

Steadfast has two Safeguarding appointed persons from the management team who are accountable to the Managing Director. Incidents or concerns are reported at local level to the appointed persons and escalated to the Director. The Safeguarding Appointed Persons are responsible for monitoring and managing incidents or concerns and liaising with the respective safeguarding agencies. The Safeguarding Appointed Person will produce an annual report on safeguarding issues raised.

### Training

The company has a duty to promote safeguarding issues and measures to staff and ensure they:

- Analyse their own practice against established good practice, and assess risk to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse (Code of Conduct)
- Follow the guidelines provided for all staff, related partners and employers
- All staff will undertake annual training on safeguarding to raise awareness of current issues and legislation.

- The Safeguarding Appointed Person will attend the recommended designated person Training every 2 years.

Employees, who are responsible for recruitment of staff, have also taken further safeguarding training 'safer recruitment' to ensure that all policies, procedures and pre- appointment checks are completed safely and accurately.

### **Disclosure Barring Service**

The company recognises it has a responsibility to ensure safe recruitment and employment practices. Steadfast outsource the service of a registered company who complete DBS checks on new and existing staff who frequently or intensively work with children, young people and adults at risk in training, supervision advice and guidance.

### **Review**

The Managing Director will review the Safeguarding Policy and associated relevant documents annually.

### **Relevant Documents**

This policy and procedure should be read in conjunction with the Code of Conduct for Staff, Safeguarding Flowchart and the Safeguarding leaflets issued to all learners at induction.

All staff should keep a copy of Appendix 1 – reporting guide

A very useful reference guide for all staff. Partners and Employers is Safer Practice, Safer Learning from the National Institute of Adult and Continuing Education (NIACE) [www.niace.org.uk](http://www.niace.org.uk)

**Jason Parnell**

**Managing Director**

## **PROCEDURE FOR REPORTING CASES OF SUSPECTED ABUSE INVOLVING CHILDREN/YOUNG PEOPLE OR ADULTS at Risk.**

### **1. THE DUTY TO REPORT**

- 1.1 WE ALL** have a legal duty to report cases of suspected abuse. If you, have concerns that a child/young person or adults at risk who have been mistreated or abused or at risk of being radicalised, you **MUST** report this, see (Safeguarding Reporting Form) which must go directly to the Designated Appointed Person as soon as possible

### **TYPES OF ABUSE**

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or otherwise causing physical harm. Physical injury may occur as a result of injury inflicted by a family member, including a brother or sister, or by another person, or an injury sustained accidentally but as a result of neglect. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as fabricated or induced illness by proxy, or Munchausen syndrome by proxy.

Bullying can also be a form of physical and emotional abuse. However, it is more often between peers and needs to be dealt with locally by personal tutors and assessor with the assistance of Designated Appointed Person, with cases reported as per Steadfast Anti Harassment & Bullying Policy.

**Psychological/Emotional abuse** is the persistent emotional ill-treatment of a person such as to cause severe and persistent adverse effects on him or her emotional development. It may involve conveying to that child or person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional and other forms of abuse may occur as a result of domestic violence. Some level of emotional abuse is involved in all types of ill-treatment or abuse, though it may occur alone.

**Sexual abuse** involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and phone images.

**Neglect** is the persistent failure to meet a child or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, or the failure to ensure access to appropriate medical care or treatment. It may also involve the neglect of basic emotional needs.

In respect to vulnerable adults, the local City and County Council Guidelines identify seven forms of abuse. In addition to the four above they also identify:

**Financial abuse** is defined as the misappropriation of money or assets; transactions to which the person could not consent or which were invalidated by intimidation or deception; or, the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and unreasonable restriction on a person's right to control over their lives to the best of their ability.

**Discriminatory abuse** is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, etc.

**Institutional abuse** is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of the providers rather than the person requiring the service.

**Modern Slavery** encompasses slavery, human trafficking, forced labour, forced marriage and domestic servitude.

### **Possible signs of Radicalisation include:**

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual may change their appearance, their health may suffer (including mental illness) and they may become isolated from family, friends, peers or social groups.

## **2. WHAT TO DO IF YOU NOTICE ABUSE/SIGNS OF RADICALISATION**

2.1 You may become aware of potential abuse in two main ways:

- .1 you may observe signs in a student that lead you to suspect that they have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition in the case of an adult at risk, they may be experiencing financial, discriminatory or institutional abuse.
  - .2 In addition to these a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.
  - .3 the students themselves may disclose to you that they have been abused.
- 2.2 If a student discloses to you that they (or indeed another child/young person or adult at risk) have been, or are being abused/radicalised

### **DO**

- **Do** listen very carefully to what they tell you.
- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and reassure the student that they have done the right thing in talking to you.
- **Do** write down as soon as you can exactly what you have been told.
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.
- **Do** preserve any evidence, taking pictures if possible and appropriate.

### **DO NOT**

- **Do not** panic.
- **Do not** promise to keep things secret. You have a duty to refer a child/young person or adult who is at risk.
- **Do not** lie or say that everything will be fine now that they have told.
- **Do not** criticise the abuser, especially if it is a parent/carer
- **Do not** ask lots of detailed or leading questions such as: 'What did he do next?' Instead, ask open questions such as: 'Anything else to tell me?', 'Yes', or 'And...?'. Do not press for answers the student is unwilling to give.
- **Do not** dispose of any evidence or allow the individual to wash themselves.

It is important that the person to whom disclosure is made **does not investigate** or question the person concerned except to clarify what

they have heard. This is particularly important in cases of sexual abuse.

- 2.3 It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse/radicalisation. Clearly all written records should be handled confidentially.
- 2.4 **You must inform the designated person immediately** if you have concerns that a child/young person or adult at risk has been, or is, being abused / radicalised. They should be informed in person, or by telephone or (in extreme circumstances) by email.
- 2.5 If, for any reason, you are unable to contact the designated person (for example in the evening) and the matter is urgent, then contact the Local Authority or the police directly and report the matter to the Head of Quality & Curriculum at next available opportunity.
- 2.6 **In all cases, if you are concerned, the rule is to pass this on quickly** and to seek help and further support, rather than to worry alone or to do nothing.

### **3. THE ROLE OF THE DESIGNATED TEAM**

- 3.1 When a member of staff refers a case of suspected abuse to a member of the Designated Team, The Lead DAP will decide whether or not the situation should be referred to the Local Authority or the police, or whether some other course of action is more appropriate. If they consider that abuse may have taken place, or that a child/young person or adult at risk, is at risk of abuse/radicalisation, they will formally notify the Local Authority or police about this. Most local authorities and safeguarding teams require an **Adult Alert Form** completed initially (located on the relevant website), containing all relevant, factual and accurate details. At this point they will take responsibility making further investigations.
- 3.2 At this point the Local Authority take over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.
- 3.3 A confidential record will be kept of all cases referred to the Designated Team, including details of cases referred to the Local Authority or the police. These records will be kept securely via a restricted file on Steadfast "T" drive system, with any paper information held securely by the HR – Finance Controller.

- 3.4 Disclosure of, or being the subject of abuse is obviously a very difficult and distressing time for the student, who will be made aware of the support available to them and helped to initiate contact with this support if so desired.

Involvement in cases of suspected abuse can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone – a colleague, a friend, a partner – they should avoid this in order to respect the confidentiality of the student concerned and only talk to a member of the designated team.

#### 4. External Contact Numbers

Safeguarding Adult Teams :	FE/HE Prevent Co-ordinators:
<p>Lincolnshire: 01522 552222</p> <p>Leicester: 01163050004</p> <p>Northamptonshire <a href="mailto:Lwalsh@northamptonshire.gov.uk">Lwalsh@northamptonshire.gov.uk</a>. Or <a href="mailto:dhiggins@northamptonshire.gov.uk">dhiggins@northamptonshire.gov.uk</a></p> <p>Derbyshire: <a href="mailto:derbyshiresab@derbeyshire.gov.uk">derbyshiresab@derbeyshire.gov.uk</a></p> <p>Staffordshire: <a href="mailto:vastaffordshire@staffordshire.gov.uk">vastaffordshire@staffordshire.gov.uk</a>. 0345 6042719</p> <p>Essex: <a href="mailto:essexsocialcare@essex.gcsx.gov.uk">essexsocialcare@essex.gcsx.gov.uk</a> 0345 603760</p> <p>Bedfordshire: <a href="mailto:Adult.protection@bedfrod.gov.uk">Adult.protection@bedfrod.gov.uk</a> 01234 276222</p> <p>Hertfordshire: <a href="mailto:Adult.safeguarding@hertscc.gcsx.gov.uk">Adult.safeguarding@hertscc.gcsx.gov.uk</a></p>	<p><b>East Midlands</b> – Sam Slack <a href="mailto:Sam.slack@derby.gov.uk">Sam.slack@derby.gov.uk</a> Telephone: 01332 643054 Mobile: 07812 301215</p> <p>East of England – Peter Martin <a href="mailto:Peter.martin@lutom.gcsx.gov.uk">Peter.martin@lutom.gcsx.gov.uk</a> Telephone: 01582 546231 Mobile: 07860 593636</p> <p><b>EMSOU - SB Lincolnshire</b> <b>PC 667 Rizwaan Chothia</b> Tel: 07795 265621 Chothia, Rizwaan <a href="mailto:rizwaan.chothia@lincs.pnn.police.uk">rizwaan.chothia@lincs.pnn.police.uk</a></p>

<p>North East: Gateshead <a href="mailto:adultsocialcaredirect@gov.uk">adultsocialcaredirect@gov.uk</a> 0191 4337033 Newcastle 0191 27883377</p> <p>Suffolk: 0808 800 4005</p> <p>Norfolk: 0344 800 8020</p> <p>Cambridgeshire: 0345 045 5202</p>	
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## Appendix 1 - Reporting guide handout

This procedure **must** be followed whenever any member of staff or related partner / employer hears an allegation from a child or adult at risk, that abuse has, or may have, occurred or where there is a significant concern that a child or adult at risk, may be abused/radicalised:

### RECEIVE

What is said

- Accept what you are told – you do not need to decide whether or not it is true
- Listen without displaying shock or disbelief.

### REASSURE

- The learner
- Acknowledge their courage in telling
- Do not promise confidentiality
- Remind them they are not to blame – avoid criticising the alleged perpetrator
- Do not promise that “everything will be alright now” (it might not be)

### REACT

- Respond to the learner but do not interrogate
- Avoid leading questions but ask open ended ones
- Clarify anything you do not understand
- **Explain what you will do next, i.e. inform a Designated Person**

**RECORD**

- Make notes as soon as possible – during the interview if you can. Include: time, date, place, the learner’s own words – do not assume – ask, e.g. “Please tell me what xxxxx means”.
- Describe observable behaviour and appearance
- Cross out mistakes – do not use Tippex
- Do not destroy your original notes – they may be needed later on and must be given to the Designated Person.

**SUPPORT**

- Consider what support is needed for the learner– you may need to give them a lot of your time to ensure they feel reassured and supported.
- Ensure you are supported – such interviews can be extremely stressful and time consuming
- Once reported to them, the Designated Person will take responsibility for the matter and will take the necessary actions. However, if you have questions or need additional support then do ask.

**Contact Information:**

Safeguarding Officer:	Safeguarding Designated Lead:
Sonia Roberts: <a href="mailto:Sonia.roberts@steadfasttraining.co.uk">Sonia.roberts@steadfasttraining.co.uk</a>	Ian Gow <a href="mailto:ian.gow@steadfasttraining.co.uk">ian.gow@steadfasttraining.co.uk</a>
Telephone: 0845 223 2401 ext: 211 Mobile: 07559 630 989	Telephone: 0845 223 2401 ext: 211 Mobile: 07533475924

### SAFEGUARDING/PREVENT FLOWCHART

