

Safeguarding and Prevent: Children and Young Persons Policy

Contents

| | |
|--|----|
| Safeguarding and Prevent: Children and Young Persons Policy | 1 |
| 1. Policy Objectives | 2 |
| 2. Scope of Policy and Responsibilities..... | 3 |
| 3. Key Safeguarding Principles | 4 |
| 4. Children..... | 6 |
| 5. What is abuse?..... | 6 |
| 6. Types of Abuse | 6 |
| 7. Signs of abuse..... | 9 |
| 8. The Prevent Duty | 10 |
| 9. British Values..... | 13 |
| 10. Working Together to Safeguard Children..... | 13 |
| 11. Reporting Allegations or Suspicions of Abuse: Procedure for Staff and Volunteers | 14 |
| 12. Making a Safeguarding Referral | 16 |
| 13. Prevent Communication Process | 17 |
| 14. Confidentiality..... | 18 |
| 15. Informing your Manager of the Referral..... | 19 |
| 16. Recording Guidance | 19 |
| 17. Allegations against staff | 19 |
| 18. Designated Persons and Single Point of Contact..... | 20 |
| 19. Safeguarding Information and Data..... | 20 |
| 20. Duty to refer Information..... | 21 |
| Appendix 1 Glossary..... | 23 |
| Appendix 3 – Supplementary guidance on safeguarding and prevent issues | 25 |

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1. Policy Objectives

- 1.1. This Safeguarding Children and Young Persons Policy represents the commitment of Inspire 2 Independence (i2i) Ltd (“the Company”) to safeguarding the welfare and protection of all children and young people at risk, who have contact with the organisation and aligns our approach to ‘Keeping Children Safe in Education (DfE, 2018)’. This includes children in need and children suffering or likely to suffer significant harm as outlined in Sections 17 and 47 of The Children Act 1989
- 1.2. Safeguarding is a term which is broader than ‘child protection’ and relates to the action taken to promote the welfare of children and protect them from harm. Safeguarding is everyone’s responsibility. Safeguarding is defined in Working Together to Safeguard Children 2018 as:
 - protecting children from maltreatment
 - preventing impairment of children’s health and development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
 - taking action to enable all children to have the best outcomes
- 1.3. The Company is committed to providing an environment where everyone is respected and valued, and can feel safe and secure. This includes the children and young people who access our facilities and services. It is therefore essential that the working environment and culture within the Company promotes that aim.
- 1.4. The Company will ensure that safeguards are in place not only protects and promotes the welfare of children e.g. with regards to: health and safety, anti- bullying, protection of children online, and photography but also it enhances the confidence of staff, volunteers, parents/carers and the general public.
- 1.5. All concerns, and allegations of abuse will be taken seriously by the Company, staff and volunteers and responded to appropriately - this may require a referral to children’s social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees and other volunteers, and in emergencies, the police.
- 1.6. The Company is committed to ensuring that children and young people are given the right support, training and encouragement to realise their true potential and make a valuable contribution to their local community and society generally. No child or group of children will be treated any less favourably than others in being able to access services which meet their particular needs
- 1.7. All individuals, regardless of age, disability, gender, race, marital status, religion or belief, sexual orientation or identity have the right to protection from all types of harm and abuse. The Company actively works to ensure that all children and young people are given equal access to its services and the support offered, providing an environment that is free from any form of discrimination and one in which safeguarding concerns are appropriately addressed.
- 1.8. The objective of this Policy is to prevent and reduce the risk of significant harm to children from sexual, physical and emotional abuse; neglect; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; grooming; sexual exploitation and the influences of extremism leading to radicalisation.
- 1.9. This policy gives guidance on what to do if you have identified concerns about a child/young person who may be in need of support or is at risk of significant harm. The policy reflects current legislation, accepted best practice and complies with government guidance from ‘Working Together to Safeguard Children (2018)’

- 1.10. The Company seeks to ensure that its Policy and procedures comply with statutory duties, reflects guidance and good practice in safeguarding children at risk, and that safeguarding arrangements are proportionate and appropriate.
- 1.11. The Company promotes this Policy to ensure that the appropriate action can be taken when an individual is suspected by staff of being subject to, or at risk of abuse from parents, carers, any adult, including any employee, or other individuals, either at work or in placement with other organisations.
- 1.12. The Company acknowledges that members of staff are not specialists in recognising where abuse may occur or has already taken place; however the Company expects all staff to adopt and support this Policy to the best of their ability. The Company will support this by providing training for staff in the Company's procedures for identifying, responding to and reporting abuse and radicalisation. The Company expects all members of staff to be sensitive and alert to the issue of abuse.
- 1.13. The Company has a statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". The purpose of this policy is to define how the Company and its subcontractors can effectively meet this duty. The Prevent Strategy is part of the Government's overall counter-terrorism strategy, known as CONTEST. The aim of Prevent specifically is to stop people becoming drawn into terrorism.
- 1.14. The three specific strategic objectives under Prevent are:
 - Respond to the ideological challenge of terrorism and the threat we face from those who promote it
 - Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
 - Work with sectors and institutions where there are risks of radicalisation that we need to address
 - (Prevent Duty Guidance in England and Wales; March 2015)

2. Scope of Policy and Responsibilities

- 2.1. This Policy applies to:
 - Children and young people.
 - Learners and customers.
 - Employees (individuals who work – or have applied to work for the Company either on a permanent, temporary, or contractual basis); and forms part of any employment or service contract.
 - Third party organisations delivering programmes and services to the children and young people
 - Employers (organisations that work in partnership with the Company)
 - Employers who offer work placements to children and young people
 - Suppliers (external partners who provide training or employability services on our behalf);
 - External stakeholders and visitors

The contents of this Policy are to be regarded by any person as implied, collateral or express terms to any employment or service contract made with the Company.
- 2.2. Any employee who does not comply with this Policy may face disciplinary sanctions which, depending on the severity of the breach, may result in dismissal from the Company. It is the responsibility of all employees to ensure they are familiar with the contents of this Policy and follow the procedures and guidelines laid out therein.

- 2.3. The Company believes that everyone has a moral responsibility to safeguard and promote each individual's welfare and protection from abuse or radicalisation/extremism. This Policy therefore also applies to all children, young people, customers, learners and other stakeholders of the Company including any person to whom the Company provides a service.
- 2.4. The Company believes that safeguarding is everybody's business, with employees playing a key role in preventing, identifying and reporting safeguarding and Prevent Duty issues. The Company's role in safeguarding is to provide the vision and direction and ensure that the legal and procedural framework, including powers and duties, is clear, and proportionate, whilst ensuring operational flexibility. This framework will be sufficient to enable employees to take appropriate and timely safeguarding action.
- 2.5. The Company recognises its particular responsibility to safeguard the wellbeing of children and young people engaged in the delivery of services offered by the Company by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment and to deal with issues concerned with suspected or reported abuse of children and young people or where an individual is at risk of being drawn into extremist or radical ideology.
- 2.6. The Company recognises that it has a duty to help employees, customers and learners, children and young people recognise their responsibilities (through guidance, support and training), understand changes in behaviour, minimise risk and avoid situations (where possible) where abuse or neglect might be alleged or where it is thought a vulnerable individual may be being groomed.
- 2.7. It is not the responsibility of the Company to decide whether or not abuse or radicalisation has taken place. The Company has a responsibility to act if there is cause for concern, in order that the appropriate agencies can investigate and take any necessary action to protect an individual.
- 2.8. All employees are expected to attend awareness training sessions, participate in online learning modules and become familiar with this document and to apply it in practice. The Company has a strategy to ensure staff awareness, continuous training and updating on legislation in relation to this and monitoring arrangements to ensure the effectiveness of our Safeguarding and Prevent: Children and Young Persons Policy and procedures.
- 2.9. The Company reserves the right to amend and update this Policy at any time.

3. Key Safeguarding Principles

- 3.1. The key principles set out below are integral to this Policy and can be used to measure existing safeguarding arrangements and to measure future improvements. The principles are not in order of priority; they are all of equal importance but with an emphasis on the importance of prevention and ensuring proportionate responses:
 - Responsibility - safeguarding is everyone's responsibility; for those children we work with or come into contact with to be safe and for our services to be effective, each employee must play their full part in safeguarding children in need.
 - Coordination - the needs and views of children and young people are paramount. The Company will adopt a coordinated and child centred approach to safeguarding ensuring all staff working with families with children listen to concerns from a child or their family and take these seriously; and work within the Company's policy guidance when deciding how to support their needs
 - Empowerment – presumption of person led decisions and informed consent. We give children and young people the right information about how to recognise abuse or radicalisation and what they can do to keep themselves safe. We give them clear and

straightforward information about how to report causes for concern, abuse and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always act in his or her best interests.

- Prevention – it is better to take action before harm occurs. We help identify and report signs of radicalisation and extremism, abuse and suspected criminal offences. We train staff how to recognise signs and take action to prevent abuse occurring. In all our work, we consider how to make people safer.
- Protection – support and representation for those in greatest need. We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for abuse and suspected criminal offences operate effectively.
- Accountability -accountability and transparency in delivering safeguarding. The roles of all employees are clear, together with the lines of accountability. Staff are trained to understand what is expected of them and others, and recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.
- Responsibility for working with employers and third parties – support in the workplace and off site delivery. We work closely with employers and third parties to ensure that they understand their responsibilities within safeguarding and prevent and that their practice mirrors the Company’s approach. Employers and third parties receive guidance on safeguarding and are aware of who to contact and how.
- Staff should not allow the fear of damaging relationships with adults; get in the way of protecting children from abuse and neglect. If referral to children’s social care is necessary, it should be seen as the beginning of a process of inquiry, not an accusation.
- Procedures are in place to ensure safeguarding concerns are dealt with promptly and appropriately.
- Recruitment and selection policies and procedures for staff will take account of the need to safeguard and promote the welfare of children and young people. This will include the introduction and adoption of Safer Recruitment tools and techniques.
- Induction training for all new staff will include safeguarding related policies and procedures. Safeguarding Children training will be provided every year for all staff regardless of role unless there are legal or policy updates, in which case additional training will be required. Safeguarding training will be delivered at a number of different levels dependent on staff level of responsibility and their likely direct or indirect contact with children and young people. Staff will have access to appropriate guidance and support when required and as appropriate
- Managers will ensure that all staff complete Safeguarding training during their probation period. The level of safeguarding training required will be dependent a person’s role description and level of responsibility, and identified at staff supervision and performance management review.
- All Staff who have direct contact with families and children online, by telephone or face to face should be encouraged to access additional training and information that may enhance their role and confidence in identifying risks and concerns about children and young people.

- Staff access and complete online safety training and are vigilant in ensuring safe searching, downloading and storage of appropriate images are carried out using the Company's technology and internet service. All i2i computers and online equipment are connected to the Sophos security filter which intercepts and blocks inappropriate content including images and websites.

3.2. Children

A child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. For individuals with learning disabilities we also include those who are 18 years old.

4. What is abuse?

- 4.1. A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children

5. Types of Abuse

- 5.1. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another
- 5.2. There are four types of child abuse taken from Working Together to Safeguard Children 2018:-

Emotional, Neglect, Sexual, Physical.

- Emotional abuse – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Neglect – the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- Sexual abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
 - Physical abuse - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - Child Criminal Exploitation; County Lines - Going County– Drug networks or gangs groom and exploit children and young people to carry drugs and money or to sell drugs from urban areas to other urban, suburban areas and rural areas, market and seaside towns.
 - Cuckooing- when drug dealers take over the home of a vulnerable individual and use it as a base for either selling or manufacturing drugs. Drug users can be targeted and offered “free” drugs or money in return.
- 5.3. All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.
- 5.4. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Safeguarding issues include:
- Breast Ironing - refers to the practice of massaging or pounding young girls’ breasts with heated objects to suppress or reverse the growth of breasts. Breast ironing is often performed by mothers or female relatives of victims misguidedly wishing to protect their young relatives from rape, unwanted sexual advances, early sex, and pregnancies, all of which they fear would result from the appearance that a girl has reached the age of puberty.
 - Children missing education - A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.
 - Child missing from home or care- Looked after children are particularly vulnerable and recent evidence indicates that they are disproportionately at risk of grooming and sexual exploitation.
 - Child sexual exploitation (CSE) – exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities. Sexual exploitation can take many forms, ranging from the seemingly “consensual” relationship where sex is exchanged for affection or gifts to serious crime by gangs and groups.
 - Cyberbullying – this can be done via text messages or the internet (social media sites) and is usually prejudged against particular groups. It can result in the intimidation of a person through the threat of violence or by isolating them either physically or on-line.

- Domestic Violence - any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Witnessing domestic abuse is child abuse, and teenagers can suffer abuse in their relationships
- Drugs – this could relate to alcohol, tobacco, illegal drugs, medicines, new psychoactive substances (legal highs) and volatile substances.
- Fabricated or induced illness – there are 3 ways in which the carer of a child will fabricate or induce an illness in a child:-
 - Fabrication of signs and symptoms – fabricating a past medical history;
 - Fabrication of signs and symptoms and falsifying hospital charts and records, including letters and documents;
 - Induction of illness by a variety of means.
- Faith Abuse – this includes belief in concepts such as witchcraft and spirit possession, demons or the devil, acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eyes or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children making them more compliant when they are being trafficked for domestic slavery or sexual exploitation.
- Female Genital Mutilation (FGM) – FGM comprises all procedures involving the partial or total removal of the female external genitals or other injury to the female genital organs for non-medical reasons. This can range from a symbolic prick to the vagina to a fairly extensive removal and narrowing of the vagina opening and in the UK all forms are prevalent. It can be known as “female genital cutting” or “female circumcision” and some communities tend to use local names for referring to this practice including “sunna”.
- Forced Marriage – a forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities cannot) consent to the marriage and duress is involved.
- Gangs and Youth Violence – “Street gangs” for whom crime and violence are a core part of their identity, although “delinquent peer groups” can also lead to increased antisocial behaviour and youth offending. Although some group gatherings can lead to increased antisocial behaviour, it should not be confused with the serious violence of a gang culture/activity.
- Gender based violence/violence against women and girls (VAWG) – refers to violence, physical, sexual or otherwise, stalking and harassment and female genital mutilation.
- Honour Based Violence - Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture.
- Mental Health – good or positive mental health is more than the absence or management of mental health problems; it is the foundation for wellbeing and effective functioning for wellbeing and effective functioning both for individuals and for their communities.
- Missing children and adults - Every year an estimated 200,000 people go missing in the UK. In some cases, missing adults may have made a choice to leave and ‘start their lives over

again', but the vast majority of missing people, children and adults, are vulnerable and need protection and support

- Private Fostering – a private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 by someone other than a parent or close relative with the intention that it should last for 28 days or more.
- Radicalisation - Radicalisation is defined by the UK Government within this context as “the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.”
- Sexting – “Sexting” is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Young people may also call it cybersex or send a “nude” picture or selfie of themselves partially clothed.
- Teenage Relationship Abuse – can be emotional, physical, sexual or financial abuse, where teenagers are isolated from their friends, being controlled with what they wear, checking up on them all the time, being forced to have sex, being forced to watch pornography against their will, forcing others to buy them things.
- Trafficking (Modern Slavery) – “Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. This could be the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

6. Signs of abuse

6.1. Some of the following signs might be indicators of abuse or neglect of a child or young person:

- Behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed.
- Clothes which are ill-fitting and/or dirty.
- Consistently poor hygiene.
- Make strong efforts to avoid specific family members or friends, without an obvious reason.
- Don't want to change clothes in front of others or participate in physical activities.
- Having problems at i2i, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- Talk about being left home alone, with inappropriate carers or with strangers.
- Reach developmental milestones, such as learning to speak or walk, late, with no medical reason.
- Regularly missing from i2i classes.
- Reluctant to go home after i2i classes.
- Poor attendance and punctuality, or who are consistently late being picked up.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children when drunk, or under the influence of drugs.
- Drink alcohol regularly from an early age.
- Concerned for younger siblings without explaining why.
- Talk about running away; and

- Shy away from being touched or flinch at sudden movements.
This is not an exhaustive list but gives a guide to some of the most common signs of abuse and neglect.
- 6.2. Staff may be alerted by the following signs:
- Posting of inappropriate photos, images or videos.
 - Suicide notes or good-bye letters.
 - Discussion of intentions to undertake risky activities, e.g. self-harm or injury.
 - Discussion of illegal activities, e.g. substance misuse.
 - Sharing of personal information or pressurising others to share personal information, e.g. email addresses, phone numbers, instant-messaging.
 - Change in the tone of messages.
 - Direct reference to safeguarding concerns, e.g. disclosure of abuse.
- 6.3. Signs of child criminal exploitation
- Often missing
 - Often travelling away from home alone
 - Suddenly have money, new clothes, new phones
 - Receiving lots more texts than usual
 - In relationships with older people
 - Unexplained injuries
 - Self-harming
 - Carrying/selling drugs
 - Seemed scared, reserved, something to hide
 - Unexplained injuries

7. The Prevent Duty

- 7.1. Section 26 of the Counter-Terrorism and Security Act 2015 ('CTSA Act') places a duty on the Company, in the exercise of its functions, to have "due regard to the need to prevent people from being drawn into terrorism". This is known as the Prevent Duty.
- 7.2. The term "due regard" as used in the CTSA Act means that the Company should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when it considers all the other factors relevant to how it carries out its usual functions and activities.
- 7.3. Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.
- 7.4. The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces."
- 7.5. The most significant and publicised threat is currently Islamic State and associated groups. However, there are wider groups outside of this such as those associated with the Far Right. The Prevent Strategy is concerned non-violent extremist groups as these can create an atmosphere in which terrorist ideology can grow.
- 7.6. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and

personal or political grievances. However, there are a number of signs and indicators that an individual could be being drawn in:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use

7.7. The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also made clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist- related activity.

7.8. The Company has implemented its Prevent-related responsibilities in a proportionate and risk-based way. All employees should demonstrate an awareness and understanding of the risk of radicalisation. The risk will vary greatly and can change rapidly; but no area, institution or body is risk free. The Prevent Duty is not about preventing individuals from having political and religious views and concerns, but about supporting our children and young people to use those concerns or act on them in a non-extremist way.

7.9. Prevent is an important element within our safeguarding policy and processes. Prevent is focused on safeguarding children and young people and encourages a learning environment where issues can be raised and discussed safely.

7.10. The Company's Senior Management Team drive our Prevent strategy by:

- Ensuring all staff, including Directors and Senior Managers receive awareness training on Prevent
 - Home Office Training for managers and delivery staff
<https://www.elearning.prevent.homeoffice.gov.uk/m/screen1>
 - Channel Training for managers
http://course.ncalt.com/Channel_General_Awareness/01/index.html
 - Wider staff awareness training for all staff
<https://www.foundationonline.org.uk/course/index.php?categoryid=14>
- Providing training to ensure staff understand their safeguarding responsibilities and processes and policy to outline how to make a referral to the Channel team
- Providing staff training and guidance on how to recognise potential signs that a customer/learner may be becoming involved with extremist organisations
- Creating a single point of contact for Prevent and Safeguarding related issues
- Maintaining links with the local Prevent Coordinators
- Ensuring British Values are promoted and are embedded within employability and skills programmes
- Maintaining IT policies that are robust and can deal effectively with potential online risks from extremist organisations, through appropriate use of firewalls and monitoring usage
- Ensuring our rigorous risk assessment process is in place and utilised which ensures Prevent is fully considered, including visitors and external speakers

- Ensuring our subcontract providers have appropriate policies in place to meet their duties under Prevent
- 7.11. Prevent work depends on effective partnership. The Company maintains productive co-operation with regional BIS Prevent Co-ordinators, local authorities, multi-agency forums and relevant stakeholders in each region.
- 7.12. Employees have a responsibility to understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. In particular, all employees should be aware of the following terms and the relationship between extremism and terrorism:
- 'Having due regard' – means that we should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when we consider all the other factors relevant to how we carry out our functions.
 - 'Extremism' – defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
 - 'Interventions' – are projects intended to divert people who are drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).
 - 'Non-violent extremism' – is extremism, as defined above, which is not accompanied by violence.
 - 'Prevention' – means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
 - 'Radicalisation' – refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
 - 'Safeguarding' – is the process of protecting vulnerable people, whether from crime, other forms of abuse or (in this context) from being drawn into terrorist-related activity.
 - 'Terrorism' – as defined by the Terrorism Act 2000, an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
 - 'Terrorist -related offences' – are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
 - 'Vulnerability' – describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent the word describes factors and characteristics associated with being susceptible to radicalisation.
- 7.13. The Prevent duty does not and must not involve any covert activity against people or communities. The Company may however need to share personal information to ensure, for example, that a person at risk of radicalisation is given the appropriate support. Information sharing is assessed on a case-by-case basis and is governed by legislation and the following principles:

- Necessity and Proportionality – personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgment of the risks to an individual or the public;
- Consent – wherever possible the consent of the person concerned should be obtained before sharing any information about them;
- Power to share – the sharing of data by the Company requires the existence of a power to do so, in addition to satisfying the requirements of the General Data Protection Regulations 2018 and Human Rights Act 1998;
- Confidentiality – the Company should be aware of any confidentiality obligations that exist.

8. British Values

8.1. The Company actively promotes the fundamental British values of:

- Democracy – an understanding of how citizens can influence decision-making through the democratic process;
- The rule of law – an appreciation that living under the rule of law protects individual citizens and is essential for wellbeing and safety;
- Individual liberty – an understanding that the freedom to choose and hold other faiths and beliefs is protected in law;
- Mutual respect – an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour;
- Tolerance of those with different faiths and beliefs – an understanding of the importance of identifying and combatting discrimination.

8.2. Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Employees should not promote, or tolerate to be promoted, views or theories as fact which are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social and cultural development, and to strengthen barriers to extremism.

8.3. The British Values and Prevent duty to relate to the Equality Act 2010 as we seek to:

- Eliminate unlawful discrimination, harassment or victimisation;
- Advance equality of opportunity between people who share a protected characteristic, and those who do not;
- Foster good relations between people who share a protected characteristic, and those who do not.

9. Working Together to Safeguard Children

9.1. Safeguarding and promoting the welfare of children is everyone's responsibility.

9.2. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

- 9.3. No single professional can have a full picture of a child's needs and circumstances.
- 9.4. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 9.5. Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising; for example mental health issues or drug and alcohol misuse.
- 9.6. Staff that work with children and young people are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
- 9.7. All staff have a responsibility to provide a safe environment in which children can learn.
- 9.8. The Company has a Designated Safeguarding Lead who will provide support to staff members to carry out their safeguarding duties. This included maintaining details of the appropriate local agencies to which they can report safeguarding concerns.
- 9.9. The Company will nominate a Safeguarding Lead (at Director level) who is responsible for maintaining a strategic overview of all safeguarding matters within the Company. This is Diane Barrow Director of Performance - Employability, Skills and Health. This is not the same role as Designated Safeguarding Lead.
- 9.10. All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an early help assessment.
- 9.11. Staff should be particular alert to children and young people who:
 - is disabled and has specific additional needs
 - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
 - is a young carer
 - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves
 - has returned home to their family from care
 - is a privately fostered child
- 9.12. The Company has established links with external agencies to enable the provision of additional or specialist support for children and young people where appropriate. All members of staff have access to a directory of support agencies within each geographical location, ensuring that children and young people can be signposted and supported appropriately.

10. Reporting Allegations or Suspicions of Abuse: Procedure for Staff and Volunteers

- 10.1. Remember – safeguarding is the term that describes the function of protecting children from abuse, neglect and radicalisation. All suspicions or allegations will be taken seriously. Employees should be aware that the needs of the child or young person at risk are paramount and must always act in the best interests of the child or young person at risk. To this end, if any member of staff reasonably suspects or is told that a child or young person at risk is being, has been, or is likely to be abused they must take immediate action as set out in this policy.
- 10.2. The following procedures should be followed if you are required to make a referral to Local Authority Children’s Social Care in England/Wales
- 10.3. It is important to emphasise that we are NOT an agency with statutory powers to investigate allegations of abuse or neglect. Neither can we remove children from abusive situations. But you may have to share your concerns with a manager and possibly make a referral to a statutory agency, as we have a responsibility to pass on such information where there is a child in need or a child suffering or likely to suffer significant harm. These agencies are:
 - In England:
 - Local Authority Children’s Social Care.
 - The Police.
 - The NSPCC.

If the person disclosing information to you is at risk of immediate physical harm or danger, ask them to call 999 and ask for the police, or alternatively make the call yourself.

Adults Social Care services should be contacted at the same time, to ensure that the safeguarding element is reported and followed up.

10.4. Pre-Referral

If a **child**/young person discloses concerns/abuse staff and volunteers should:

- **Listen carefully to the child.** Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking.
- **Let them know they've done the right thing.** Reassurance can make a big impact to the child who may have been keeping the abuse secret.
- **Tell them it's not their fault.** Abuse is never the child's fault and they need to know this.
- **Say you believe them.** A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them.
- **Don't talk to the alleged abuser.** Confronting the alleged abuser about what the child's told you could make the situation a lot worse for the child.
- **Explain what you'll do next.** If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help.
- **Don't delay reporting the abuse.** The sooner the abuse is reported after the child discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- **Consult with your immediate line manager** who in turn will discuss with the Designated Safeguarding Lead.

- When referring a safeguarding matter to the Designated Person, the line manager must, in the first instance, email the Safeguarding Cause for Concern Form immediately to the Safeguarding Designated Person via the Single Point of Contact email address safeguarding@enteri2i.com or prevent@enteri2i.com as appropriate, followed by a telephone call to confirm receipt and discuss the matter – using the details in in *Section 18.2 Designated Persons and Single Point of Contact*
- 10.5. **If a concern or allegation is made about a staff member within the Company;** do not inform the person in question as this might prejudice any police investigation. Contact your line manager immediately, who in turn will contact the Designated Safeguarding Lead and the HR Manager
- 10.6. **If the concerns or allegations are raised by another person,** e.g. a member of the public or another professional: the staff member receiving the allegation must make notes of the information and contact their line manager who in turn will contact the Designated Safeguarding Lead, who must consult with them immediately about what action to take.
- 10.7. **If an adult discloses abuse of a child or young person to a member of staff,** the staff member who receives the information must make it clear to that person that the information will be passed to their line manager for consultation and for further action to be taken. If the member of staff has any reason to believe that having this conversation could place themselves or the child/young person being abused at risk, they must ask another member of staff to join them if possible. If this is not possible, e.g. due to lone working, they should listen attentively but must take every precaution to maintain their own safety and end the conversation if necessary.
- 10.8. All staff are responsible for contacting their immediate line manager as a matter of urgency to discuss a concern to reduce any risk of further harm to the child or young person.
- 10.9. Staff should never feel inhibited to seek advice and guidance about any concern for a vulnerable child/young person's safety and wellbeing.

11. Making a Safeguarding Referral

- 11.1. All decisions about managing a safeguarding concern should not be made by one person in isolation; unless the child or young person is at risk of immediate physical harm or danger. In this situation, call 999 and ask for the police. **You should then contact your immediate line manager for further guidance and support who, in turn, will contact the Designated Safeguarding Lead.**
- 11.2. All concerns regardless of whether they lead to a referral should be discussed with a line manager as soon as possible. A decision should then be made about whether a referral is appropriate.
- 11.3. A telephone call to the relevant Children's Social Care service or the Police or the NSPCC (England only) should be the first action when initiating a referral during office hours.
- 11.4. It is the responsibility of the duty social worker in Children's Social Care Services to assess the risk to the child/young person. All referrals should be followed up with a written referral. Note: staff/volunteers should provide as much detail as they have
- 11.5. It can be helpful to make accurate notes on what the child/young person said to you. Social care services will require:
- The child's details (name, age, address) and any information you have about the alleged abuser.
 - Take detailed notes on what you tell them.
 - Share this information with others, such as the police, if necessary.
 - Advise you on any other support available to you.

- 11.6. **It's worth remembering that in most cases the child and family of concern need support. Services will work with the family, not against them. Unless the level of risk requires the courts to get involved immediately, care proceedings will only start after extensive efforts are made to keep the child with their family by working with them to address any risks.**
- 11.7. The staff member making the referral (the referrer) should be given details from the person in Children's Social Care, the Emergency Duty Services or Police Officer receiving the referral. The referrer is responsible for recording these details within their notes. This should include:
- A contact name and telephone number.
 - Any action they intend to take.
 - When the action will take place.
 - What the referrer should say to the child.
 - Any additional action required by the referrer.
 - Whether they intend to feed back to the referrer about the action they take.
- 11.8. The written referral form to Children's Social Care should be completed by the person initiating the referral immediately following the telephone referral.
- 11.9. The immediate line manager, in consultation with the Designated Safeguarding Lead, will be available for advice and guidance and should provide additional assistance to complete the referral form and send to the appropriate social care agency for all staff within all directorates. Additional assistance will be provided to volunteers to complete the referral form
- 11.10. If an incident of abuse is considered to be a criminal offence then the matter will be referred to the Police immediately. Examples of when action may be considered a criminal offence include: assault, whether physical or psychological, sexual assault and rape, theft, fraud or other forms of financial exploitation, and certain forms of discrimination, whether on racial or gender grounds.
- 11.11. Other incidents of abuse will be reported by the Designated Person to Adult Social Services, the Local Safeguarding Children Boards (LSCBs) and/or Local Authority Designated Officer (LADO) as appropriate. The Designated Person will complete the Safeguarding Risk Assessment Form and file securely. The Designated Safeguarding Lead will work with MASH teams, the Police, Samaritans and Channel as appropriate.
- 11.12. For all employees working within the National Citizen Service (NCS) contract, any safeguarding issue or incident should be reported without delay to the line manager who will then notify the Designated Safeguarding Lead and Tim Pattenden – Head of Performance & Operations. The incident will then be reported to Pharos Response as per the NCS Crisis & Incident Reporting Guide.
- 11.13. In the event of a Safeguarding incident being reported where it is linked to a service user belonging to one of Inspire 2 Independence's prime contractors, the staff at Inspire
- 11.14. 2 Independence will follow the reporting procedures outlined by Inspire 2 Independence within our Safeguarding and Prevent policy. At the point where the Designated Safeguarding Lead (DSL) confirms that the incident is one that is classed as safeguarding. The DSL will immediately contact the DSL of the according prime contractor and escalate all of the information using the appropriate and secure processes. The DSO of Inspire 2 Independence will then await direction from the DSL of the prime contractor and support as required. Inspire 2 Independence will retain copies of all incidents, actions taken and the outcome within our internal safeguarding reporting systems.

12. Prevent Communication Process

- 12.1. Concern raised about staff member, learner or customer welfare in terms of potential risk of radicalisation

- 12.2. Immediately discuss concerns with line manager or one of designated members of staff, contact details as indicated in Section 18.2 Designated Persons and Single Point of Contact
- 12.3. Make a written record using the Safeguarding Cause for Concern form, as soon as practicable after concerns are raised and hand to line manager and email to Single Point of Contact email address prevent@enteri2i.com
- 12.4. Once reviewed the designated person may feel that no further safeguarding action should be taken, however it may be appropriate to offer the learner or customer some ongoing support
- 12.5. If concerns continue then the designated member of staff refers to local Prevent Coordinator following up in writing within 48 hours
- 12.6. Prevent Coordinator acknowledges receipt of referral and decides on next course of action. Note: The Company may be asked to participate with a multi-agency approach under Channel but will be guided by Prevent team.
- 12.7. In the event of a Prevent incident being reported where it is linked to a service user belonging to one of Inspire 2 Independence's prime contractors, the staff at Inspire 2 Independence will follow the reporting procedures outlined by Inspire 2 Independence within our Safeguarding Children and Young Persons Policy. At the point where the Designated Safeguarding Lead (DSL) confirms that the incident is one that is classed as a Prevent incident. The DSL will immediately contact the DSL of the according prime contractor and escalate all of the information using the appropriate and secure processes. The DSL of Inspire 2 Independence will then await direction from the DSL of the prime contractor and support as required. Inspire 2 Independence will retain copies of all incidents, actions taken and the outcome within our internal safeguarding reporting systems.

13. Confidentiality

- 13.1. Disclosure by a child of abuse, ill treatment or neglect, and the consequences of such a disclosure is not easy. It is likely to have profound effects on the child/young person and other family members. It may be difficult for them to agree to a referral to statutory services.
- 13.2. All children and young people receiving support or services from the Company must be made aware that complete confidentiality is not possible where there is risk of significant harm or abuse to them or another individual.
- 13.3. Where a child or young person has not consented to sharing information for a referral, the reasons for the referral need to be clearly explained to them so that any ongoing/future supportive relationship can be maintained as far as is possible.
- 13.4. **Under no circumstances should an alleged abuser be alerted, directly or indirectly, that concerns have been raised.** This may result in important evidence being lost. Formal investigations will be carried out by the appropriate statutory agency.
- 13.5. It is good practice to inform a child/young person in need or at risk from abuse that a safeguarding referral is being made where appropriate taking into account their age and understanding. It should be made clear that this will be to another adult who will make a decision about what help and support they need to stay safe.
- 13.6. All requests for information about a child or family by an external organisation, in connection with an assessment of the need for protection under Section 47 or a child in need under Section 17 of The Children Act (1989), should be discussed with the line manager.
- 13.7. Any decision not to pass on information relating to a child under Section 17 or Section 47 of The Children Act to the Police or Children's Social Care is a serious matter. A Care Director must agree a course of action and the decision with supporting reasons should be recorded in Raisers Edge (RE).

An ongoing risk assessment will be required in consultation with the Regional Delivery Manager responsible for that area of work

14. Informing your Manager of the Referral

- 14.1. On completion of the written referral it should be sent to the Line Manager. The Line Manager should check that the referral form contains all relevant information about the concern discussed, including contact information for Children's Social Care should they need further contact. Where necessary the line manager will provide support to staff to complete the referral form. Additional assistance will be provided to all volunteers.
- 14.2. The referral should be sent by the line manager as a PDF document, via secure email, to Children's Social Care.
- 14.3. All safeguarding referrals should be recorded within the Company's central safeguarding log.
- 14.4. Whenever concerns are raised about a child in need or at risk, whether through an allegation or the observation of a set of circumstances, it is crucial to make and keep an accurate record.

15. Recording Guidance

- 15.1. Whenever concerns are raised about a child in need or at risk, whether through an allegation or the observation of a set of circumstances, it is crucial to make and keep an accurate record.
- 15.2. The following guidance should be followed:
 - Whenever possible and practical, take notes during any conversation.
 - Ask for consent to do this and explain the importance of recording information.
 - Explain that the person giving you the information can have access to any information about them.
 - Where it is not possible or appropriate to take notes at the time, make a written record as soon as possible afterwards and always before the end of the day.
 - Record the time, date, location, format of information (e.g. letter, telephone call, direct contact) and all persons present when the information was given
- 15.3. Include as much information as possible but be clear about which information is fact, hearsay, opinion and do not make assumptions or speculate.
 - Include the context and background leading to the disclosure or concern.
 - Include full details of referrals to Children's Social Care and the Police.
 - Pass all original records to the Company's Group Designated Safeguarding Lead.
- 15.4. Please note all documents must be stored in line with the Company's General Data Protection Regulations Policy and Document Retention Policy.

16. Allegations against staff

- 16.1. Allegations about staff abuse of a child or young person must be raised immediately with the Safeguarding Lead (as set out in 18.2) who will alert the appropriate agency. The Director in consultation with HR will make a decision to suspend or remove the employee or volunteer from active service pending the outcome of an investigation.
- 16.2. Personal information may be disclosed without the individual's consent if there are reasonable grounds to believe that an individual is at risk of harm

17. Designated Persons and Single Point of Contact

- 17.1. The Company has designated persons who are ultimately responsible for all safeguarding issues within the Company, as listed below, to whom queries can be made.
- 17.2. **All reporting of incidents/occurrences must be sent to the Single Point of Contact email address safeguarding@enteri2i.com or prevent@enteri2i.com as appropriate.** All designated persons receive emails sent to the Single Point of
- 17.3. Contact email address.
- **Designated Safeguarding Lead:**
Daniel Gagg, Quality Assurance & Curriculum Manager
(daniel.gagg@enteri2i.com - Single Point of Contact number 07526 168 276)
 - **Deputy Safeguarding Coordinators:**
Michelle Mills – Head of Performance and Operations, Employability
(michelle.mills@enteri2i.com 07720 972 900)
 - HR
Heather Williams – HR Manager
(heather.williams@enteri2i.com, 01904 606 000)
 - Michelle Collinson – Skills Division Operations Manager
(michelle.collinson@enteri2i.com, 07824 413 321/01904 606 000)
 - The Group Managing Director also acts as a Designated Person; however, all safeguarding matters are dealt with foremost by the Lead Designated Person.
- 17.4. Out of Hours: The Company does not operate outside of 8.30am – 5pm Monday to Friday, however, should there be any cause for concern outside of this time please dial Single Point of Contact number 07526 168276. In the event of any emergency please call 999.
- The role of the Designated Person is to take lead responsibility for managing safeguarding and prevent issues. This involves providing advice and support to other staff, making referrals to, and liaising with, the local authority and working with other agencies. The Designated Person is a member of the Senior Management Team and takes responsibility for the Company's safeguarding practice, policy, procedures and professional development.
 - The Designated Safeguarding Lead receives all referrals and reports. The Designated Person is ultimately responsible for deciding action to be taken and retains all documentary safeguarding reports.

18. Safeguarding Information and Data

- 18.1. The Company will manage its employees', young people, customers' and learners' information in line with statutory and contractual requirements and in accordance with the Company's own values of being straightforward, accessible, and professional. As the Company handles sensitive personal information about people, it must ensure that there is no unauthorised access, loss, misuse, modification or disclosure of this information.
- 18.2. The General Data Protection Regulations does not prevent an employer from carrying out effective vetting controls but balances the employer's needs and the applicant's right to respect for his or her private life. The important considerations are (i) that checks are carried out uniformly on a non-discriminatory basis and (ii) that privacy rights, where relevant, are respected.

- 18.3. All relevant documentation will be kept securely locked and a clear desk Policy must be in place at all times by those involved in handling personal information.
- 18.4. Any documents that contain personal data and require disposal should be securely
- 18.5. shredded, and any related documents that need to be emailed must be encrypted following the proper encryption process.
- 18.6. When safeguarding children at risk, there may be a need to disclose personal or sensitive information to someone from another organisation. The Company will only do this where the law permits, and where disclosure is considered to be in the best interests (safeguarding) of the person, including the prevention of a crime and on a need to know basis.
- 18.7. Wherever abuse is alleged or suspected, the Company will seek to share information between relevant professionals in exploring how to protect the individual concerned or others. People who are subject to abuse or allegations of abuse and their families have a right to expect that confidences will be respected and their privacy protected. But where their “vital interests”¹ (that is questions of life or death), “best interests”, or the public interest are involved, establishing the facts through information sharing takes precedence.
- 18.8. Information can be shared in certain circumstances with other people or agencies in compliance with the General Data Protection Regulations 2018. Data can be shared with third parties “in the vital interest of the data subject” or “in the public interest” (e.g. in the interest of the client or others in the same setting). Examples of when this may be appropriate will be if there is a need to seek information from another agency, or there is a potential risk to others from the alleged abuser. Any information relating to the accusation/suspicion of abuse should and can be shared with the Social Services department or Police investigating the case.
- 18.9. If personal or sensitive information is to be shared, this will be done (where possible) with the person’s agreement. In the absence of such, assessment of their best interests may still justify further enquiries, while questions involving the public interest may justify overriding their views. The rights of “whistle-blowers” and of alleged perpetrators of abuse will also be respected.
- 18.10. Information shared will always be on a “need to know” basis, i.e. such which is necessary to achieve the objective of safeguarding children at risk. Care will be taken to ensure the quality of the information shared, e.g. names, addresses and dates of birth are accurately recorded.

¹ General Data Protection Regulations 2018

19. Duty to refer Information

- 19.1. The Safeguarding schemes and this Policy impose a duty on the Company to refer relevant information about individuals where this may affect their suitability to perform a regulated activity.
- 19.2. The Company is required to make a referral to the DBS where an employee has been cautioned or convicted of a 'relevant offence' (for example, a sexual or violent offence). The Company is also required to make a referral where employees are dismissed or removed from a regulated activity because they have engaged in 'relevant conduct' (for example, endangering someone or engaging in violent or inappropriate sexual conduct) in relation to children at risk. A referral
- 19.3. must also be made where the individual has satisfied the 'harm test' (for example,
- 19.4. where there has been no relevant conduct but a risk of harm exists). The duty to refer information on an individual remains where he or she would have, or may have, been dismissed, or removed from such work, had he or she not resigned.
- 19.5. If the Company suspects that a crime has been committed, it will also notify the police.
- 19.6. Referrals should be made as soon as the conduct, or allegation, becomes known. The Company will investigate the matter as soon as possible to establish the facts and to gather evidence. As the DBS

itself has no investigatory powers, it is important that the Company gathers as much relevant evidence as possible to help determine if the allegations are substantiated, even if the individual has left employment. This will assist the DBS in reaching any subsequent barring decision.

- 19.7. The DBS will consider the facts of each case, including any evidence that has been provided, and reach a decision on whether or not it is appropriate to bar that individual from working in a regulated activity with children. The individual may have an opportunity to make representations before a barring decision is made but in serious cases the DBS may automatically decide to bar the individual. This may, for example happen where the individual has committed sexual or violent offences against children or adults.

Appendix 1 Glossary

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children

The following categories of child abuse are taken from 'Working Together to Safeguard Children (2018)'

- Physical abuse
- Emotional Abuse.
- Sexual Abuse.
- Child sexual exploitation
- Neglect.
- Extremism
- County Lines
- Child criminal exploitation

In addition, organised or multiple abuse, past/historical abuse, domestic abuse and E-Safety Incidents all come under the term 'child abuse'. (It should be noted that where the police are called to a scene of domestic abuse, and a child is present, the police should inform Children's Social Care of their attendance at such an incident).

Child abuse, including grooming, can take place online and can lead to a breach in The Sexual Offences Act (2003). As Technology develops, the internet and its range of services can be accessed through various devices including tablets, mobile phones and cameras as well as games consoles and computers. As a consequence web based technology has become a significant tool in enabling cyber bullying to take place as well as offensive and inappropriate images/messages being shared and/or used inappropriately, either accidentally or deliberately.

Staff should note that where an E-Safety incident occurs, in addition to making a referral to Social Care, a referral should also take place to CEOP (Child Exploitation Online Protection Centre) Link Here: <http://www.ceop.police.uk/safety-centre>.

Appropriate Agency

These agencies are responsible for the investigation and coordination of all incidents of suspected abuse. This would be the jurisdiction of the agency closest to where the child/young person at risk is residing.

Where there is an indication that a criminal offence has been committed the appropriate agency is ALWAYS the police.

Child in Need

A child in need is defined under the Children Act 1989 as a child who

- is unlikely to achieve or maintain a reasonable level of health or development, or
- whose health and development is likely to be significantly or further impaired, without the provision of services; or
- a child who is disabled.

If, as a result of a referral, there are indications that the child is a Child in Need or a Child in Need

of Protection, which may include concerns of significant harm, Children Social Care Services will conduct an Assessment. An Assessment determines whether the child is in need or in need of Protection, the nature of any services required and whether a more detailed assessment should be undertaken, including where necessary a Section 47 Enquiry

Children and Young People

A child is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. For individuals with learning disabilities we also include those who are 18 years old.

The fact that a child has reached 16 years of age, is living independently or is in further education etc. does not change his/her status or entitlements to services or protection.

Child Protection

Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society.

Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Parent Carer

A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.

Safeguarding

Safeguarding is the term that describes the function of protecting children and young people from abuse or neglect. It is an important shared priority and a key responsibility of the Company and its employees.

Safeguarding relates to the need to protect children and young people who may be in vulnerable circumstances. These are individuals who may be at risk of abuse or neglect, due to the actions (or lack of action) of another person. In these cases, it is critical that we work together to identify people at risk, and put in place interventions to help prevent abuse or neglect, and to protect people.

Young Carer

A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work

Appendix 3 – Supplementary guidance on safeguarding and prevent issues

Department for Education guidance

Safeguarding children who may have been trafficked

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Multi-agency statutory guidance on female genital mutilation

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Child abuse linked to faith or belief: national action plan

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

Use of reasonable force in schools

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

Safeguarding children and young people from sexual exploitation

<https://www.gov.uk/government/publications/safeguarding-children-and-young-people-from-sexual-exploitation-supplementary-guidance>

Safeguarding children in whom illness is fabricated or induced

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Preventing and tackling bullying

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Keeping children safe in education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Information sharing advice for safeguarding practitioners

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Safeguarding disabled children

<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>

National service framework: children, young people and maternity services

<https://www.gov.uk/government/publications/national-service-framework-children-young-people-and-maternity-services>

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Guidance issued by other government departments and agencies

Forced marriage

<https://www.gov.uk/guidance/forced-marriage>

Stop forced marriage

<https://www.gov.uk/stop-forced-marriage>

Violence against women and girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

Guidance for health professionals on domestic violence

<https://www.gov.uk/government/publications/guidance-for-health-professionals-on-domestic-violence>

Disclosure & Barring Service

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

Child protection and the dental team

<https://www.bda.org/childprotection>

Prison, probation and rehabilitation: Public Protection Manual

<https://www.gov.uk/government/collections/prison-probation-and-rehabilitation-public-protection-manual>

Ministry of Justice: Probation service guidance on conducting serious further offence

<http://www.justice.gov.uk/downloads/offenders/probation-instructions/pi-10-2011-review-further-offences.doc>

Missing Children and Adults strategy

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

Recognised, Valued and Supported: next steps for the carer's strategy

<https://www.gov.uk/government/publications/recognised-valued-and-supported-next-steps-for-the-carers-strategy>

Guidance issued by external organisations

BAAF: Private fostering

http://www.privatefostering.org.uk/?gclid=CLvorZLL_qcFUkAod9Tsatg

General Medical Council: Protecting children and young people: doctors' responsibilities

http://www.gmc-uk.org/guidance/ethical_guidance/13257.asp

NICE: Child maltreatment: when to suspect maltreatment in under 18s

<https://www.nice.org.uk/guidance/CG89/>

Supplementary guidance to support assessing the needs of children

Child abuse concerns: guide for practitioners

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Safeguarding children

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

Prevent Duty

Counter-Terrorism and Security Act 2015

<http://www.legislation.gov.uk/ukpga/2015/6/contents>

Prevent duty guidance

<https://www.gov.uk/government/publications/prevent-duty-guidance>

'Channel' guidance

<https://www.gov.uk/government/publications/channel-guidance>