



Safeguarding Children, Vulnerable Adults & Prevent Policy

January 2019

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Contact Details for Rotherham Local Authority Prevent contacts

- Carol Adamson – Community Safety Officer
- Telephone: 01709 822772
- Email: carol.adamson@rotherham.gov.uk
- PC Zuleika Payne – Rotherham Local Policing Team
- Email: zuleika.payne@southyorks.pnn.police.uk
- Anti-terrorist hotline: 0800 789 321

1 General Policy Statement

Achieve through Learning, is committed to safeguarding and promoting the welfare of all our learners and believe all our staff have an important role to play in ensuring this happens. However, it needs to be highlighted that currently ATL only deliver an SFA 19+ apprenticeship contract, which means the majority of learners recruited to our programmes are employed by the companies we work within, but it is recognised that some of these adults could be considered vulnerable.

We believe that every learner, regardless of age, have a right to feel safe and protected which is reflected within ATL's health and safety, equality of opportunity, complaints procedures and terms and conditions of learning outlined and provided to every learner at induction.

Overall Aims

Achieve through Learning is committed to ensuring that we:

- Clarify standards of behavior for staff and learners
- Introduce appropriate work within the programme
- Develop staff awareness of the causes of abuse
- Address concerns at the earliest possible stage

To contribute to the protection of learners in the following ways:

- Inclusion of appropriate work within our programmes
- Working in partnership with other agencies as required
- Provide a safe environment for people to learn in
- Identify people who are suffering, or likely to suffer significant harm
- Take appropriate action to see that such people are kept safe, both at work and during their training with ATL.

All staff will:

Be familiar with the ATL's Safeguarding Children and Vulnerable Adults Policy.

Be alert to signs and indicators of possible abuse.

Record concerns on a "Cause for Concern" form (**see Appendix One**), and submit to Natalie Wilson – Designated Safeguarding Advisor.

Raising awareness of issues relating to the welfare of people and the promotion of a safe environment for the people learning with ATL.

Aiding the identification of people at risk of significant harm, and providing procedures for reporting concerns.

Establishing procedures for reporting and dealing with allegations of abuse against members of staff.

The safe recruitment of staff.

In developing this policy and procedures, ATL will consult with, and take account of, guidance issued by the Department for Education and Skills, the Safeguarding Children Board (SCB) and other relevant bodies and groups.

ATL will refer concerns that a person might be at risk of significant harm to the nominated person internally. This person holds responsibility for protection issues.

ATL recognises the following as definitions of abuse:

Physical Abuse

Physical abuse causes harm to a person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. (1).

Neglect

Neglect is the persistent or severe failure to meet a person's basic physical and/or psychological needs. (2). It will result in serious impairment of health or development.

Sexual Abuse

Sexual abuse involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the person to be aware that the activity is sexual and the apparent consent of the person is irrelevant. (3).

Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the person's behaviour and emotional development, resulting in low self worth. (4).

Some level of emotional abuse is present in all forms of abuse.

1. It also includes fabricated or induced illness
2. This includes lack of access to medical care
3. This includes the use of online images and exploitation through the use of new technology e.g. mobile phones
4. This includes bullying, cyber bullying and exploitation.

Overall Aims

To contribute to the prevention of abusive experiences in the following ways:-

- Clarifying standards of behavior for staff and learners
- Introducing appropriate work within the programme
- Developing staff awareness of the causes of abuse
- Encouraging students participation in practice
- Addressing concerns at the earliest possible stage

To contribute to the protection of learners in the following ways:

- Inclusion of appropriate work within the programme
- Implementing safeguarding protection policies and procedures where appropriate
- Working in partnership with learners, employers and agencies

To contribute to supporting learners in the following ways:

- Designing plans to meet learners needs
- Identifying individual needs where possible
- Support any action to progress areas of weakness or development in ATL's safeguarding arrangements.

2 Designated Staff with Responsibility Protection

Lead Responsibility

The designated person with lead responsibility for protection issues is:

Natalie Wilson

This person has a key duty to take lead responsibility for raising awareness within the staff of issues relating to the welfare of vulnerable people, and the promotion of a safe environment for the people learning with ATL.

They have received training in protection issues and inter-agency working, and will receive refresher training at least every 2 years. They should keep up to date with developments in protection issues.

The designated person is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Providing advice and support to other staff on issues relating to protection
- Maintaining a proper record of any protection referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with other appropriate agencies
- Liaising with employers
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Ensuring that staff receive basic training in protection issues and are aware of the ATL protection procedures

The designated member of staff will provide an annual report to the Director of ATL setting out how ATL has discharged its duties. They are responsible for reporting deficiencies in procedure or policy to the Director at the earliest opportunity.

3 Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

If a person tells a member of staff about possible abuse:

- Listen carefully and stay calm.

- Do not interview the person, but question normally and without pressure, in order to be sure that you understand what the person is telling you.
- Do not put words into the person's mouth.
- Reassure the person that by telling you, they have done the right thing.
- Inform the person that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.
- Note the main points carefully.
- Make a detailed note of the date, time, place, what the person said, did and your questions etc.

Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Person.

4 Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether training & assessing, administrative or management. The word "staff" is used for ease of description.

1 Introduction

1.1 In rare instances; staffs working in Training Institutions have been found responsible for abuse. Because of their frequent contact with people, staff may have allegations of abuse made against them. ATL recognises that an allegation of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigation is thorough and not subject to delay.

2 Receiving an Allegation from a person

2.1 A member of staff who receives an allegation about another member of staff from a person should follow the guidelines in Part 3 for dealing with disclosure.

2.2 The allegation should be reported immediately to the designated member of staff, unless the designated member of staff is the person against whom the allegation is made, in which case the report should be made to the Executive Director of Finance & Resources at Leeds College of Building. The designated member of staff (or designated person if the allegation is against the designated member of staff) should:

2.2.1 Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the designated person.

2.2.2 Record information about times, dates, locations and names of potential witnesses.

3 Initial Assessment by the designated person

3.1 The designated person should make an initial assessment of the allegation, consulting with the Manager and other agencies as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the person has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the Police.

3.2 It is important that the designated person does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

3.3 Other potential outcomes are:

3.3.1 The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the person. The matter should be addressed in accordance with the ATL disciplinary procedures.

3.3.2 The allegation can be shown to be false because the facts alleged could not possibly be true.

4 Enquiries and Investigations

4.1 Protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by ATL. ATL may be able to use the outcome of external agency enquiries as part of its own procedures. The protection agencies, including the police, have no power to direct ATL to act in a particular way; however, ATL should assist the agencies with their enquiries.

4.2 ATL shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff's disciplinary procedures.

4.3 If there is an investigation by an external agency, for example the police, the designated person need to normally be involved in, and contribute to, the inter-agency strategy discussions. The designated person is responsible for ensuring that ATL supports the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The designated person shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

4.4 Subject to objections from the police or other investigating agency, the designated person shall:

4.4.1 Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.

4.4.2 Inform the Manager of the allegation and the investigation.

4.5 The designated person shall keep a written record of the action taken in connection with the allegation.

5 Suspensions of Staff

5.1 Suspension should not be automatic. In respect of staff other than the Manager, suspension can only be carried out by the Manager.

5.2 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

5.3 Suspension should only occur for a good reason. For example:

5.3.1 Where a person is at risk.

5.3.2 Where the allegations are sufficiently serious to justify dismissal on the grounds of gross misconduct.

5.3.3 Where necessary for the good and efficient conduct of the investigation.

5.4 If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

5.5 Prior to making the decision to suspend, the Manager should interview the member of staff. This should occur with the approval of the appropriate agency. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

5.6 The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a friend. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

5.7 During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

5.8 If the Manager considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible, ideally within one working day.

5.9 The Manager shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The external investigating authorities should be consulted.

5.10 The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

5.11 The suspension should remain under review in accordance with ATL disciplinary procedures.

6 The Disciplinary Investigation

6.1 The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

6.2 The member of staff should be informed of:

6.2.1 The disciplinary charge against him/her.

6.2.2 His/her entitlement to be accompanied or represented by a trade union representative or friend.

6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

6.4 The person making the allegation should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to work of the member of staff (if suspended).

6.5 The Manager should give consideration to what information should be made available to the other staff of ATL.

7 Allegations without foundation

7.1 Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to other agencies so that they may act upon the information.

7.2 In consultation with the designated senior member of staff, the Manager shall:

7.2.1 Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or protection action will be taken. Consideration should be given to offering counselling/support.

7.2.2 Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

8 Records

8.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file.

8.2 If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about ATL statutory duty to inform the relevant agencies.

9. Monitoring Effectiveness

9.1 Where an allegation has been made against a member of staff, the Manager, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of ATL procedures and/or policies. Consideration should also be given to the training needs of staff.

10. Prevent

10.1 Prevent is 1 of the 4 elements of [CONTEST, the government's counter-terrorism strategy](#). It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views

- provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism. We would expect appropriate members of staff to have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity.

We define extremism as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with 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.” Such staff should have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response. This will include an understanding of when to make referrals to the Channel programme and where to get additional advice and support

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

The Home Offices uses a range of measures to challenge extremism in the UK, including:

- where necessary, preventing apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- funding a specialist police unit which works to remove online content that breaches terrorist legislation
- supporting community based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context they work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

ATL is committed to supporting vulnerable students through its safeguarding agenda in order to prevent potential radicalisation.

Vulnerability factors

10.2 ATL will ensure that all staff are familiar with some of the factors that might contribute towards an individual becoming radicalised. The list below is not an exhaustive list and the presence of any of these factors does not necessarily mean that he/she will be involved in extremist activity. However, a combination of many of these factors may increase the vulnerability to extremist activity.

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging

- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues
- Over-identification with a group or ideology
- 'Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

10.3 ATL recognises its responsibility to promote community cohesion, tolerance and respect between members of ATL and the wider community.

10.4 ATL understands how the experiences faced by some learners, families and communities may contribute to the process of radicalisation and support for extreme violence.

10.5 ATL will adopt the approach and use professional judgment to implement strategies in individual cases where concerns have been raised about violent extremism. ATL may draw on wider support from the community and other local partners to work with individuals or groups of learners.

10.6 A member of the management team may in certain circumstances take the decision to report any suspicious activity or concerns relating to violent extremism to the Police Counter Terrorism Unit. This will be done on a case by case basis and the report will be kept private and confidential from the wider workforce to maintain privacy rights of any individual. The contact number for the anti terrorist hotline is 0800 789 321.

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ATL recruitment procedures are reviewed regularly to ensure that they take into account the following:

- They apply to all staff.
- The post or role will be clearly defined.
- The key selection criteria for the post or role will be identified.
- Vacancies will be advertised widely in order to ensure a diversity of applicants.
- Require documentary evidence of academic/vocational qualifications.
- Obtain professional and character references.

- Verify previous employment history.
- Disclosure and Barring Service (DBS) disclosure for those that require it.
- Use a variety of selection techniques e.g. Qualifications, previous experience, interviews, checks.

Appendix 1

Strictly Private and Confidential

Privileged/confidential information is contained in this document. Without prior permission you may not distribute, print or copy this document or disclose its contents to anyone. If you have received this document in error please notify the Safeguarding Officer.

Safeguarding cause for concern form

Please note that the details of disclosure **must** be passed to the designated Safeguarding Officer or in their absence the deputy. You must not deal with this yourself.

Section 1						To be completed by the person raising the concern							
Name of learner:								Course:					
Date of birth:				Gender:		M <input type="checkbox"/>		F <input type="checkbox"/>		Age on date of referral:			

Member of staff completing this form:					
(Of observed behaviour/discussion/disclosure)					
Day:		Date:		Time:	
				Place:	
Please indicate the nature of the safeguarding issue you are concerned about					

- Physical abuse

 Sexual abuse

 Emotional abuse
 Neglect

 Mental ill health

 Suicide/Self harm
 Financial abuse

 Forced marriage

 Learner may be a risk to others

Nature of incident/concern including relevant background information Do not interpret what is seen or heard simply record the facts. (Record learner words verbatim – if appropriate)

Section 2: For designated staff use only (please tick relevant items)					
Action taken	Yes	No	By whom	Date	Outcome
Discussed with learner	<input type="checkbox"/>	<input type="checkbox"/>			
Checked learner file	<input type="checkbox"/>	<input type="checkbox"/>			
Contacted family (if appropriate)	<input type="checkbox"/>	<input type="checkbox"/>			
Refer to local authority	<input type="checkbox"/>	<input type="checkbox"/>			
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>			