



## Safeguarding and Prevent Policy

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<b>Approved by</b>	Susan Kirby
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## **I.INTRODUCTION**

The Castleview Group fully recognises the responsibility it has regarding safeguarding and promoting the welfare both physical and emotional of every child, young people and vulnerable adults both inside and outside of the learning environment including the need for early support and intervention. We implement a whole organisational preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children, young people and vulnerable adults is at the forefront of all actions taken.

This policy sets out a clear and consistent framework for delivering this promise in line with safeguarding legislation and statutory guidance. It outlines a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children, young people and vulnerable adults. This ensures that relevant employment and security checks are undertaken as required and that staff and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed and where required risk assessments are in place.

### **Applies to:**

This policy applies to all staff, part time, permanent, temporary and agency, whether teaching, administrative, management or support as well as volunteers and visitors. The word 'staff' is used for ease of description.

### **Context:**

This Policy has been developed to bring together the Key Principles of Safeguarding. It aims to provide staff with guidance to ensure that understand their responsibilities under safeguarding and statutory guidance, are alert to the signs of child abuse and know how to refer concerns to Designated Safeguarding Lead and Deputy Designated Safeguarding Lead around acting on a learner concern and the difference when responding to a learner in immediate danger.

The Castleview Group operates a culture of openness and transparency and embeds the principles of 'The 5R's' across all our services and ensure all colleagues, volunteers, delivery partners and contractors understand their responsibilities regarding safeguarding.

### **The 5 R's:**

- |           |   |
|-----------|---|
| Recognise | the signs and indications of abuse.   |
| Respond   | as soon as possible.  |
| Record    | everything you have heard, was said or any actions seen.                    |
| Report    | ensure you report the concern/incident.                                     |
| Refer     | to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead. |

The Child Protection and Safeguarding Policy covers all members of the Group community but highlights specific reference to safeguarding children and vulnerable adults. Definitions of these categories are as follows:

**The broad definition of a child is:**

*'Anyone who has not reached their 18th birthday. 'Children' therefore means 'children and young people' The fact that a child has reached 16 years of age, **is living independently or is in further education**, does not change his or her status or entitlement to services or protection under the Children Act 1989.'* (Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children DCSF, March 2010 / updated 2013).

**The broad definition of a vulnerable adult/Adult at risk is:**

*'Anyone aged 18 years and over who are dependent on family members, their social network, professionals or volunteers, as a result of a special need arising from the ageing process, physical or mental ill-health, learning disability or physical or sensory impairment. It is the level of dependency in respect of the meeting of basic needs that renders these adults particularly vulnerable. Vulnerable adults may be victims and/or abusers and they may themselves be in a caring role' (Sunderland Safeguarding Adults Procedural Framework – Sunderland Safeguarding Adults Partnership). [www.alertabuse.org.uk/](http://www.alertabuse.org.uk/)*

## **II. POLICY STATEMENT**

The Castleview Group fully recognises its statutory and moral duty to ensure that we function with a view to safeguarding and promoting the Prevent Duty, Equality and Diversity, Bullying and the health and welfare to all to whom we provide education and training this includes children, young people and vulnerable adults. The Castleview Group recognises its responsibility and acknowledges that it is the duty of the workforce in its entirety to uphold British Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces potential risk of being exposed to violence, extremism, exploitation, or victimisation. Therefore colleagues, volunteers, delivery partners and contractors will always show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders.

We endeavour to create and maintain a safe learning environment for all children, young people and vulnerable adults. Together with a Designated Safeguarding Lead and Deputy Safeguarding Lead to ensure that appropriate protocols are in place. Any identified concerns or requests for early support and intervention can be addressed and supported in partnership with other agencies, as appropriate.

## **III.CONTENT**

### **Legal Framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, young people and vulnerable adults. This policy considers, amongst others, some of the following publications:

The Children Act 1989 placed a duty on local authorities to investigate situations where a child or young person is at risk of significant harm. Schools, Colleges, and Training Providers have a legal obligation to work with investigating agencies acting on behalf of children or young people in need. Guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and young people and underpinned our common law duty of care.

This was replaced and extended in January 2007 by 'Safeguarding Children and Recruitment in Education', which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of colleagues. The responsibility for making sure appropriate arrangements is in place lies with The Castleview Group.

This Policy has been created with due regard to all relevant legislation including but not limited to, the following.

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Care Act 2014
- The Mental Capacity Act 2005
- Equality Act 2010
- Protection of Freedoms Act 2012
- UN Convention on the Rights of the Child 1991
- Human Rights Act 1998
- Counter Terrorism & Security Act 2015

### **Statutory Guidance**

- Keeping Children Safe in Education (KCSIE 23)

- HM Government (2013) 'multi-agency practice guidelines: Handling cases of Forced Marriage'
- Prevent Duty Guidance (DfE 2015 -last update Dec 23))
- 'Working together to Safeguard Children' (DfE 2023)
- 'Disqualification under the Childcare Act 2006' (DfE 2018)

### **Non-statutory Guidance**

- 'What to do if you're worried a child is being abuse' (DfE 2015)
- 'Information sharing' (DfE 2018)
- 'Child sexual exploitation' (DfE 2017)
- 'Sexual violence and sexual harassment between children in schools and colleges' OFSTED
- The 'No Secrets' guidance which sets out a code of practice for the protection of vulnerable adults.

Additionally, the Group's Directors note and draw to the attention of the Group staff the criminal offences that may be committed in connection with the welfare of children, young people and vulnerable adults, in particular those involving abuse of trust which prohibits staff from engaging on or encouraging sexual activity with learners who are under the age of 18 or deemed vulnerable. This policy makes protection responsibilities clear and gives the Group the ability to dismiss or otherwise discipline employees who fail in this duty.

The Castlevue Group will also ensure that all personal data will be processed in accordance with the requirements of the GDPR 2018. This will ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary to support a child, young person or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child, young person or vulnerable adult and on a strict 'need to know' basis and guidance is readily available through the Information Sharing Guidance for Practitioners and through the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

### **Safeguarding Roles and Responsibilities of the Group**

We are committed to ensuring that we fulfil the following objectives:

- Promote British Values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourage children, young people and vulnerable adults to raise any concerns.

- Encourage children, young people and vulnerable adults to develop a sense of autonomy and independence in their learning and development.
- Enable children, young people and vulnerable adults to have the self-confidence and the vocabulary to resist in appropriate approaches.
- Work with employers to build their understanding of and commitment to the principles of safeguarding and prevent duty.
- Liaise with other statutory agencies to ensure legislative procedures are current.
- If we are delivering training as part of a subcontractor, we will follow the Lead's Contracts referral process for Safeguarding.
- Providing the means to identify children, young people and vulnerable adults who may benefit from early help and intervention.
- Identifying children, young people and vulnerable adults who are suffering, or likely to suffer, significant harm,
- Recognising that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children and young people.
- identifying concerns regarding children, young people and vulnerable adults who may be being subject to radicalisation.
- taking appropriate action to see that such individuals are kept safe, both at our training locations and at home or within the wider community.

***The Safeguarding Team***

<b>Designated Safeguarding Lead (DSL) Prevent Lead</b>	<b>Deputy Designated Safeguarding Lead</b>
Martin Wright <a href="mailto:Safeguarding@castleviewgroup.co.uk">Safeguarding@castleviewgroup.co.uk</a>  07754 704557	Laura Russell <a href="mailto:Safeguarding@castleviewgroup.co.uk">Safeguarding@castleviewgroup.co.uk</a>  07754 704557

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will undertake refresher training each year and will attend further training as and when required to enhance their knowledge base and function in this specialist capacity. Designated Safeguarding Lead and Deputy Safeguarding Lead will work in partnership and in accordance with organisations' procedures where required including Local Designating Officers, Local Safeguarding Children's partnership, Local Safeguarding Adult Partnership and the Chanel multi-agency panel.

All staff will receive safeguarding training during their induction, and annual update training to update themselves with safeguarding legalisation and their responsibilities relating to the Group's policies and procedures. All staff members will receive required safeguarding updates via email, hot topics, quarterly newsletter, and staff meetings as required.

## Safer Recruitment

When recruiting new members of staff, The Castleview Group follows the government guidance;

**'Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012 and 'Keeping Children Safe in Education 2023 -Part 3'**. The Castleview Group uses the DBS checking service to assess applicants' suitability for positions of trust, the company complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. Two appropriate references that cover a 3-year period or more are obtained and to ensure qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining professional references and checking previous employment history. It also includes undertaking interviews and checking the candidate's DBS status which includes Criminal Records Bureau and barring list and right to work in England checks.

Newly appointed colleagues will have a job role induction having a robust into the child, young person and vulnerable adults groups safeguarding procedures which will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for a staff to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in their new role.

Probation allows the manager of the newly appointed staff to assess objectively whether the new member is suitable for the role, considering the individuals overall capability skills, performance and general conduct in relation to the job in question.

The Castleview Group shall ensure that all staff are made aware of the standards expected of them and will put in place the appropriate support, training and feedback to achieve these standards.

We provide adequate and appropriate staff resources and training to meet the needs of children, young people and vulnerable adults.

All staff, volunteers who work with children, young people and vulnerable adults are informed by the Employment and Skills Director that their job falls under the DBS requirement for an enhanced check under section 128 of the Education Skills Act 2008.

We will provide the applicant with more information about the level of check required (Criminal record check applicants must be 16 or over). There are 3 types of checks:

- Basic/Standard (these checks for spent and unspent convictions, cautions, reprimands, and final warnings).

- Enhanced (this includes the same as the standard check plus any additional information held by local police that reasonably considered relevant to the workforce being applied for).
- Enhanced with list checks (this is like the enhanced check but includes a check of the DBS barred lists).

All staff will be issued with a copy of Keeping Children Safe in Education 2023 Part 1 via email which is returned via an email confirmation when read.

In line with statutory changes, underpinned by regulations, Castleview will maintain a Single Central Record (SCR). This document will cover the following people:

The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained apply:

- Identity checks.
- Relevant DBS checks to be undertaken.
- Further checks on people who have lived or worked outside the UK: this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions.
- A check of professional qualifications; and
- A check to establish the person's right to work in the United Kingdom.

### **External Speakers**

At Castleview Group we ensure that any external speakers are appropriately vetted before any public speaking or events are arranged. We ensure that all stakeholders remain free from extremist or inappropriate material to avoid influence or exposure. Liaison will take place with the Prevent Coordinator to pass on any concerns regarding speakers and to access details for vetted reputable speakers. In the event of any concerns raised regarding external speakers, this will be passed on immediately to the Prevent Coordinator to ensure this does not continue in other agencies.

The DSL and DDSL will ask for a copy of their DBS check if they haven't got a DBS check then a DBS risk assessment will be in its place.

### **Information Sharing and Record Keeping**

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information there are seven rules we follow:

- The Data Protection Act is not a barrier to sharing information.
- Be open and honest.
- Seek advice.
- Share with consent where appropriate.
- Consider safety and well-being.
- Ensure that information sharing is appropriate and secure.
- Keep a record.



The colleague who receives an allegation or disclosure should make an immediate written record of the conversation, including the following information:

- Date and time of report.
- Name of Individual.
- DOB of Alleged.
- Nature of Allegation.
- Any other information given including siblings if relevant.
- Confirmation that the child, young person, vulnerable adult, or colleague has been advised of the next steps.

### **Our local contact**

County Durham Safeguarding Adults Inter-Agency Partnership  
Children and Young People's Services  
Room 4/129-134  
County Hall  
Durham  
DH1 5UL

### **Definitions of Significant Harm (*Extracts from Working Together & KCSIE*)**

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children and gives local authorities a duty to make enquires to decide whether they should take action to safeguard or promote the welfare of a child.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child or young person, and / or relatively greater difficulty in helping them to overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation, or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development.

### **E-Safety**

All learners and staff are expected to use the internet for research, communication and to view information relevant to the job role and course content. Castle view always promote safe use of the internet in line within our Internet, Email and Social media Policy.

Inappropriate use of the internet is screened using search history reports by the Castle view Group IT partner NTE.

Staff will actively monitor children, young people and vulnerable adult's internet usage and are encouraged to review sites before recommended use.

The safe and responsible use of technology is sometimes presented as primarily a child or vulnerable adult protection issue. While children, young people and vulnerable adults do need support to keep themselves safe online the risks associated with the use of technology. Examples include the mismanagement of personal data, risks of financial scams, identity theft, cyber bullying, grooming, and radicalisation.

### **Use of the Internet**

Use of the Internet by employees or child, young people or vulnerable adults are encouraged where such use is consistent with their work and with the goals and objectives of Castlevue Group in mind. Reasonable personal use is permissible during appropriate break times, subject to the following:

- Users must not participate in any online activities that are likely to bring Castlevue Group into disrepute, create or transmit material that might be defamatory or incur liability on the part of the Company, or adversely impact on the reputation of the Company.
- Users must not visit, view, or download any material from an internet site which contains illegal or inappropriate material. This includes, but is not limited to, pornography (including child pornography), obscene matter, hate material, violence condoning messages, criminal skills, terrorism, cults, gambling and illegal drugs.
- Users must not knowingly introduce any form of computer virus into the Company's computer network.
- Personal use of the internet must not cause an increase for significant resource demand, eg storage, capacity, speed or degrade system performance.
- Users must not 'hack into' unauthorised areas.
- Users must not download commercial software or any copyrighted materials belonging to third parties unless such downloads are covered or permitted under a commercial agreement or other such license and approved by the Company.
- Users must not use the internet for personal financial gain.
- Users must not use the internet for illegal and criminal activities, such as but not limited to, software and musical piracy, terrorism, fraud or the sale of illegal drugs.
- Use of the internet for personal reasons, (eg online banking, shopping, information surfing) must be limited, reasonable and done only during non-work time such as lunchtime.
- Use of gambling sites, online auction sites and other such inappropriate websites is **not** permissible. If you are in any doubt, you should confirm with your line manager whether a site is permissible, before accessing the site.
- Staff may face disciplinary action or other sanctions if this policy is breached.

## **The Prevent Duty**

In 2010, the Government published the Prevent Strategy. This raised an awareness of the specific need to safeguard children, young people and families from violent extremism.

Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Prevent is about Safeguarding our learners to keep them both safe and within the law. The Prevent Duty is not about preventing students from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways.

Radicalisation & Extremism - The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL / white supremacy groups, anti-gay groups, Islam / Christian ideology. The Counter Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Castleview is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the company's safeguarding duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Children, young people or vulnerable adults may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

*Extremism is defined by the Government 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.

## **Responding to suspicions of Radicalisation and Extremism**

We are alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection. When any member of staff has concerns that a learner may be at

risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead for investigation and action.

- Disclosure records are held by the Safeguarding team and stored on a secure server.
- Staff take care not to influence the outcome either through the way they speak to or question children/young people.
- We will continue to welcome the learner whilst investigations are being made. The learner may choose to withdraw from learning activities whilst investigations take place.

We follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services and designated roles and tasks in supporting the learner, family, and employer after any investigation. The DSL and DDSL will also utilise the following resources when preventing radicalisation:

- Local Police
- The DfE's dedicated helpline (0207 3407264)
- The Channel Awareness programme
- The Education Against Hate Website

All investigations are kept confidential and shared in line with the GDPR and Information sharing procedures.

**Recognition of Vulnerability factors can include:**

*Identity Crisis*

The child, young person or vulnerable adults is distanced from their cultural/religious heritage and experiences discomfort about their place in society.

*Personal Crisis*

The child, young person or vulnerable adult may be experiencing family tensions, a sense of isolation and low self-esteem, they may have dissociated from their existing friendship group and become involved with a new and different group of friends, they may be searching for answers to question about identity, faith and belonging.

*Experiences of Criminality*

This may include involvement with criminal groups, imprisonment and poor resettlement/reintegration.

However, this list is not exhaustive, nor does it mean that all children, young people or vulnerable adults experiencing the above are at risk of radicalisation for the purpose of violent extremism.

*Special Educational Needs*

A child, young person and vulnerable adults may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivation of others.

## **Channel**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit, and it aims to:

Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.

Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.

Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

## **Actions to Implement and the develop policy.**

The Group will establish, maintain, and regularly review the Child Protection and Safeguarding Policy which has four main elements: prevention, procedures, support for learners and preventing unsuitable people from working with learners. We will therefore:

Establish and maintain an ethos where learners feel secure and are encouraged to talk, and are listened to, including the provision of an email address that learners can use to directly contact a DSL or DDSL (at [safeguarding@castleviewgroup.co.uk](mailto:safeguarding@castleviewgroup.co.uk)).

Ensure that learners know that there are staff in the Group whom they can approach if they are worried or in difficulty.

Ensure staff at the Group receive adequate training in relation to Safeguarding. Staff will be given an annual refresher training once a year. This will be raised by the Employment and Skills Director who looks after the Single Central Record.

Provide a systematic approach and awareness raising for staff so that issues/lifestyles/personal circumstances, which may increase the chance of safeguarding issues arising, are logged. Further, that referrals for support are made in a timely manner, where appropriate and that outcomes are recorded on the Safeguarding Central Register in order that the potential for harm or exploitation is minimised (e.g., where a vulnerable person discloses that they are sofa-surfing).

The Group will follow the locally agreed multi-agency procedures as set out by the local authorities in which we work.

We will ensure that every member of staff:

- knows the name and contact details of Designated Safeguarding Lead and Deputy Designated Safeguarding Lead and their roles.
- understands their individual responsibilities for progressing Safeguarding concerns using proper channels and within the timescales set out in the locally agreed multi-agency procedures.
- knows where to access the Child Protection and Safeguarding Policy and procedures together and contact details for the relevant local multi-agency procedures.

We will ensure that all support staff have an understanding of the responsibility placed on the Group and its staff for safeguarding children, young people and vulnerable adults by setting out its obligations in appropriate Group publications.

Provide initial, and annual update, training for all staff on Safeguarding & Prevent from the point of their induction, and safeguarding updates in the form of training, emails, bulletins etc as required. Staff should know:

- their personal responsibility.
- the locally agreed procedures.
- the need to be vigilant in identifying cases of abuse or neglect.
- how to support and to respond to a learner who tells of abuse or neglect.

Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding Safeguarding matters including attendance and written reports at any Safeguarding / child protection meetings.

Keep clear detailed written records of concerns about safeguarding learners (noting the date, event and action taken), even where there is no need to refer the matter to external agencies. This is recorded on the Safeguarding Central Register.

Ensure all records are kept secure in a locked location and are only accessible by the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

We will endeavour to support vulnerable learners through ensuring that the Group:

- Promotes a positive, supportive and secure environment.
- Give vulnerable learners a sense of being valued.
- Liaises with other agencies supporting vulnerable learners.
- Is committed to developing productive and supportive relationships with parents, guardians or carers whenever it is in a vulnerable learner's best interest to do so.
- Recognises that learners may live in a home environment where there is domestic violence, drug or alcohol abuse and are in need of support and protection.
- Is vigilant in monitoring all learner welfare, keeping records and notifying Social Care, as soon as there is an area of a concern.

### **Monitoring and Evaluation**

The Designated Safeguarding Team will continually monitor and evaluate all issues relating to safeguarding children, young people and vulnerable adults. A bi-annual report will be presented to the Directors on Safeguarding issues; DSL and DDSL will contribute to this from the outcomes of any safeguarding incidents/concerns will be responsible for ensuring that reports are submitted, considered and acted upon. The Employment and Skill Director will also ensure that the QIP is updated with key time-bound actions and that impact is assessed.

### **Procedures for Responding to Safeguarding Concerns**

Learners may choose to share concerns with staff they feel they can trust and with whom they feel comfortable. Likewise, staff may identify concerns through their interaction with a learner. Staff need to know how to respond sensitively and who to approach for advice. Whilst staff are not responsible for investigating abuse it is essential that any allegations or suspicions of abuse are acted upon and treated seriously. Concerns should be passed on immediately to the Designated Staff so that appropriate action can be taken.

The following guidelines should be followed:

- a. Do not put yourself at risk, stay calm and reassure the person that he/she was right to tell you.

- b. Do not interview them, but instead listen carefully, allow the person to recall significant events – they may not tell anyone again.
- c. It may be necessary for you to request information in order to be clear about what is being disclosed. You must ask open questions and must not lead the individual as this may jeopardise future investigations.
- d. Do not promise confidentiality. Be honest. Explain that you need to pass the information to the Designated Safeguarding Officer and explain that you must do this in order to ensure that an experienced person can provide support/investigation. Ensure the individual is aware that only those who need to know will be told.
- e. Note the details of what you witnessed (if applicable) and what has been disclosed to you, in the individual's own words, and write down the place, date and time of disclosure/witnessing. Also note any questions you asked and the answers that were provided. Do this as soon as possible after the event.
- f. Note the setting and anyone there at the time – describe any significant points about the adult's appearance, demeanour and mood and also the environment, e.g. furniture disturbed, or if any property was missing or damaged.
- g. Be careful to only report factual information and take care not to interpret responses.
- h. A body map can be used to illustrate any physical injuries.
- i. Use dark ink so your notes can be photocopied if required, sign and date everything you have written and pass notes to the DSO as quickly as possible and within 24 hours.
- j. Be aware that, where there is such evidence, medical and criminal evidence may need to be preserved, so do not attempt to remove torn or soiled clothing and avoid touching or moving anything in the immediate environment.
- k. Do not talk to the alleged perpetrator(s) or pass on any information about the individual at risk. It is particularly important in every safeguarding circumstance that you maintain confidentiality of information and only release it to a DSO, a senior manager in their absence, or relevant external authority eg Police, Social Services, Paramedic or Health Service Professional.
- l. Alerts to the DSO should be made as soon as abuse or neglect is witnessed or suspected and without delay, **using a safeguarding concerns / disclosure form**. At a maximum, this must be within 24 hours. They may involve the police, other emergency services or the relevant social services provider in the local authority area.



- m. You should refer all safeguarding concerns to the DSL but it may sometimes be necessary to take action immediately to a situation to prevent further harm and all staff must exercise their Duty of Care to learners and each other, and act as responsible citizens to ensure that emergency services/social services provider are contacted immediately, where needed.
- n. Immediate protective actions should not incur irresponsible risk for the person identifying the concern.
- o. Forms for recording this information are available at **Castleview View Group – Documents – Employment Support – Safeguarding – Safeguarding Report Form** or are available in allocated trays in the office. Tutors will have Safeguarding Report Forms in their Tutor Packs.
- p. If the Designated Safeguarding Officers are not available advice can be sought from a member of the senior management team, who will support you in any required actions, including liaison with Social Care providers, or the Police, as required.
- q. The DSL and DDSL investigating may take one or more of the following actions:
  - i Referral to Local Authority Designating Officers of the relevant local authority using the normal referral or consultation procedure required by the locally agreed framework. \*
  - ii An internal investigation and consideration of any action involving staff or learners (Disciplinary Procedure for Staff).
  - iii Investigation of a possible criminal offence by the Police. If a crime is suspected, the staff member investigating will report it to the Police.

**Incidents of alleged abuse may constitute potential criminal behaviour and must be treated as such until otherwise determined by the Police/Crime Prosecution Service.**

Generally, referrals to social care / police are made by a member of the Safeguard Team, however if after discussion with the Designated Safeguarding Officer the member of staff believes that a referral should be made but the Designated Safeguarding Officer does not, then he or she may make the referral directly.

#### ***Procedures to Address Allegations of Abuse Made Against a Staff Member***

In addressing allegations of abuse made about staff, the Group will seek to ensure compliance with the prevailing guidance from the relevant local Safeguarding Adults Board, United Kingdom employment legislation, laws of natural justice and its own internal procedures. These arrangements relate to all staff and volunteers working for the Group.

- a. The person to whom an allegation or concern is first reported should treat the matter seriously, keep an open mind and follow the guidance on responding to an allegation or suspicion of abuse.
- b. The concern should be reported immediately to the DSO or in their absence to the Link Director for Safeguarding. Where the allegation is made against the DSO, the Link Director should be informed. Where a concern is reported against the Link Director an external body will be used to investigate and in so doing, we will ensure fairness and impartiality.
- c. The DSO investigating may take one or more of the following actions:
  - i Referral to Social Services of the relevant local authority using the normal referral or consultation procedure required by the locally agreed framework.
  - ii An internal investigation and consideration of any action involving staff or learners (Disciplinary Procedure for Staff).
  - iii Investigation of a possible criminal offence by the Police. If a crime is suspected, the staff member investigating will report it to the Police.

Incidents of alleged abuse may constitute potential criminal behaviour and must be treated as such until otherwise determined by the Police/Crime Prosecution Service.

Generally, referrals to social care / Police are made by a member of the Safeguard Team, however if after discussion with the Designated Safeguarding Officer the member of staff believes that a referral should be made but the Designated Safeguarding Officer does not, then he or she may make the referral directly.

**Note:**

Under the Sexual Offences Act a relationship between a member of staff and a learner, considered to be an “adult at risk”, may constitute an “abuse of trust” particularly where there is a power imbalance, and the adult does not have the capacity to consent.

The Sexual Offences Act 2003 introduced additional occupations to which **Section 21 ‘Position of Trust’** applies. These cover employees who *look after* young people under 18 on an individual basis by providing services under the Learning and Skills Act 2000. As necessary, CASTLEVIEW GROUP TRAINING will comply with guidance on making staff referrals to the Independent Safeguarding Authority

#### IV. GLOSSARY

Term	Explanation
Learners	Replaces the term ‘children, young people and adult learners.’

Radicalisation	The process by which a person comes to support terrorism and forms of extremism.
Vulnerable individuals	In the context of radicalisation, a vulnerable individual is a person who because of unique circumstances, state of mind and life experiences can be led into some form of terrorist ideology. Specific background factors may contribute to vulnerability and susceptibility to radicalisation.
Vulnerability	Describes the condition of being in need of special care, support, or protection because of age, disability, risk of abuse or neglect.
Extremism	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. The definition of extremism also includes calls for the death of members of our armed forces, whether in this country or overseas.
Ideology	A set of beliefs
Terrorism	An action that endangers or causes serious violence, damage, or disruption, is intended to influence the government, or intimidate the public.
Susceptibility	Is complex and unique to a person's circumstances. Within Prevent, susceptibility refers to the fact that a person may be likely or liable to be influenced or harmed by terrorist and extremist ideologies that support or radicalise people into terrorism. As set out in the Prevent duty guidance, a person's susceptibility may be linked to their vulnerability, but not all people susceptible to radicalisation will be vulnerable. There may be other circumstances, needs or other underlying factors that may make a person susceptible to radicalisation but do not constitute a vulnerability.

## **APPENDIX 1**

# **SAFEGUARDING PROCESS FLOWCHART**

*'SAFEGUARDING IS EVERYONE'S RESPONSIBILITY'*

### **IDENTIFY**

*IF YOU IDENTIFY A SAFEGUARDING ISSUE – THIS COULD BE FROM A LEARNER, COLLEAGUE OR YOURSELF, PLEASE FOLLOW THE SAFEGUARDING PROCESS.*

*IF THE SAFEGUARDING IS AN EMERGENCY – PLEASE CALL 999 AND THEN FOLLOW THE SAFEGUARDING REPORTING PROCESS.*

### **REPORTING**

*PLEASE FILL OUT AN SAFEGUARDING REPORT FORM.*

*THIS NEEDS TO HAVE THE INFORMATION EXACTLY AS THE PERSON HAS SAID IT.*

*PLEASE MAKE SURE IT IS TIME ACCURATE AND DATED BUT NO OTHER PERSONAL DETAILS APART FROM NAME TO BE MENTIONED.*

### **SAFEGUARDING DETAILS**

SAFEGUARDING REPORT FORM NEEDS COMPLETING ACCURATELY USING THE PERSONS OWN WORDS. THIS IS TO BE SUBMITTED TO EITHER SAFEGUARDING TEAM BY HAND OR EMAIL [SAFEGUARDING@CASTLEVIEWGROUP.CO.UK](mailto:SAFEGUARDING@CASTLEVIEWGROUP.CO.UK) OR CALL 07754704557

THE SAFEGUARDING TEAM WILL REACT IMMEDIATELY AND TAKE ALL CONCERNS SERIOUSLY.

## APPENDIX 2

### Threats to safety

#### *Bomb threat*

This procedure outlines the actions that should be taken should we receive a bomb threat or hoax. Such incidents are rare, but they do happen in some businesses and when they do, they are hugely disruptive and often lead to full premises evacuations and occasional short-term closures to verify and ensure safety and callout of emergency services as required.

The great majority of bomb threats are, indeed, hoaxes, designed to cause alarm and disruption. While bomb threats may be made by phone, an increasing number are sent electronically by email or social media. What all bomb threats have in common is that they amount to a criminal offence under Section 51 of the Criminal Law Act 1977 and Section 1 of the Malicious Communications Act and should be reported to the police.

#### *The Bomb Threat Message*

Precise motives for hoaxing are difficult to determine but may include revenge, extortion, a desire to impress – the intent is to cause fear and/or disruption for the victim.

If we receive a telephone call you should:

- Stay calm and listen carefully – hold up the bomb threat card shown in Appendix 1
- Grab a copy (if you can) of the bomb-threat checklist shown below in Appendix 2
- Keep the caller talking if possible.
- If displayed on your phone, note the number of the caller, otherwise, dial 1471 to obtain the caller's number once the call has ended.
- If the threat is a recorded message, write down as much detail as possible.
- If the threat is received by a text message, do not reply to, delete, or forward the message, note the number of the sender, and follow police advice.
- Know who to contact in your department upon receipt of the threat.

If a threat is delivered face to face:

- Try to remember as many distinguishing features of the threat maker as possible You can use the following to quickly write down a description of the person delivering the message:

- A - Age
- B - Build
- C - Colour
- D - Distinguishing marks
- E - Elevation (height)
- F - Face
- G - Gait (the way they walk)
- H - Hair, habits (facial twitches, chewing gum etc.)

If they arrived in a vehicle the following can be used to describe it:

- S - Shape (saloon/pick up/van etc.)
- C - Colour
- R - Registration Number
- I - Identifying Features (dents, spoiler etc.)
- M - Make/model

If the threat is discovered in a written note:

- The note must be treated as police evidence and must not be touched by any other colleague. If possible, place the note in a plastic bag and seal it.

If a threat is delivered via e-mail or social media:

- Do not reply to, forward or delete the message.
- Note the sender's email address or social media username/user ID.
- Preserve all log web files to help any police investigation.

### *Assessing the Credibility of Bomb Threats*

This is a critical task, especially if the threat of attack is imminent. In the absence of detailed information, several factors should be considered:

- Is the threat part of a series of threats? If so, what happened on the previous occasion?
- Can the location of the bomb/device be established? If so, can the location be made safe?
- Is there a good reason to believe the caller?
- Could an evacuation move people closer to the source of the device?
- Is a suspicious device visible at the alleged location?

### *Actions to Consider*

Evacuation will be appropriate when directed by the police or it is reasonable to assume that the threat is credible, and evacuation will move colleagues and learners towards a safer location.

Invocation will be appropriate when it is safer to remain inside a building, ensuring everybody is away from walls and windows.

Neither of the above will be reasonable and proportionate if the threat is deemed to be implausible (i.e., a deliberate hoax).

### *Media and Communication*

Avoid revealing details about incidents without consulting the police as this may play into the threat-maker's hands. Any external communication **must** go through the Managing Director and the Marketing Manager

And finally:

- Ensure all colleagues who may receive internal calls are aware of this procedure and its location.
- Assign relevant roles and responsibilities to support any evacuation procedures.
- Carry out evacuation drills at appropriate intervals to ensure everyone is prepared.
- Make provision for those colleagues or learners with specific needs at times of evacuation.
- Adopt a 'clear building' policy so that unfamiliar items can be quickly identified, good housekeeping will support this.
- Ask relevant colleagues to conduct safety walkabouts and report causes for concern.

### ***Threat of Firearms or Weapon Attack***

The police and security service have been working constantly to foil terrorist attacks for years, not months. Due to events in the UK and abroad, people are understandably concerned about a firearms or weapons attack. These attacks are very rare but in the event of such an attack, it helps to be prepared. Remember, attacks of this nature are still very rare in the UK.

To watch the Stay Safe film, visit [www.npcc.police.uk/staysaf](http://www.npcc.police.uk/staysaf)

**RUN** to a place of safety. This is a far better option than to surrender or negotiate. If there's nowhere to go, then...

**HIDE** It's better to hide than to confront. Remember to turn your phone to silent and turn off vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so...

**TELL** the police by calling 999.