


# Safeguarding & Prevent Policy

V5.3 September 2021

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Version 5.0	08/03/21	Debbie Gardiner MBE & Jaquie Elsey Manning	Policy re-write.	March 2022
Version 5.1	23/03/21	Debbie Gardiner MBE	Change of how to contact the ESFA in Page 4: 5.1, 8.6, page 8.	March 2022
Version 5.2	04/08/21	Debbie Gardiner MBE	Change of DSOs, changes reflect the new 2021 guidance and minor text changes throughout.	March 2022
Version 5.3	23/09/21	Debbie Gardiner MBE	DSO lists updated.	March 2022
Version 5.4	30/06/22	Melanie Payne	DSO Lists updated	October 2022

Signed:



Printed Name:

Stephen Smith

Job Title:

Managing Director

Date:

23<sup>rd</sup> September 2021

Learn Plus Us has pledged to ensure that all staff are committed to safeguarding and promoting the welfare of Apprentices and learners. We are committed to ensuring that all learners are able to access premises and facilities free from fear of harm and are protected from mistreatment and abuse. This policy covers Safeguarding, the Prevent Duty and other related and relevant concerns. We adopt a whole organisation approach to safeguarding and the Prevent Duty.

In order to aid in this, Learn Plus Us has appointed the following:

- Designated Safeguarding Lead (DSL): Melanie Payne, 07742 457462, [melanie@learnplusus.co.uk](mailto:melanie@learnplusus.co.uk)
- Designated Deputy Safeguarding Lead (DDSL): Stephen Smith, 07973 147781, [stephen@learnplusus.co.uk](mailto:stephen@learnplusus.co.uk)
- Designated Safeguarding Officer (DSO): Janet Dawson, 07950 860137, [janet@learnplusus.co.uk](mailto:janet@learnplusus.co.uk)

All staff are required to demonstrate high standards in their management of risk and in the active protection of children and vulnerable adults from discrimination and avoidable harm fulfilling their duties for learners under 18 in accordance with;

- Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021 - [Keeping children safe in education 2021 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)
- What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)
- Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)
- Prevent duty guidance: DfE for further education institutions in England and Wales April 2021 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Section 26(1) of the Counterterrorism and Security Act 2015 (“the Act”) imposes a duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for LPU as an independent training provider, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that we must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners. The Board accepts the accountability for upholding this legislation, all employees have a responsibility to meet these requirements and follow our policy and procedures.

A large proportion of our learners are adults (not vulnerable adults), some are Apprentices, some are on other funded training and some on a commercial programme. We've adopted a risk-based proportionate approach to our policy and procedures relating to the Prevent Duty and Safeguarding. We work with several regulated work placements in the Childcare and Adult Care sectors and support them to meet their requirements s employers and also develop strategies that support their resilience against extreme narratives.

We will promote and get commitment to this policy through regular staff meetings, the output of the safeguarding team meetings, staff induction, annual training, policy updates published on our HR system Breath, the production of case studies, sharing of relevant local and national news items, learner topic of the month and through the Apprentice/learner induction and progress review process. Additionally, we will engage with employers to get their commitment and offer support and training to further enhance their knowledge and understanding of Safeguarding and the Prevent Duty.

### **Purpose**

The protection of children and the safeguarding of vulnerable adults are concerned with preventing emotional, physical or sexual abuse to learners whether that abuse is happening inside or outside Learn Plus Us. This Policy sets out what the staff are committed to do with regards to safeguarding children and vulnerable adults.

This procedure seeks to promote the welfare of children and vulnerable adults by making clear the responsibility of staff and the responsibility of Learn Plus Us management.

Through observations, discussions, training and raising awareness we will support the Governments' Prevent Duty, targeted at anti-radicalisation and anti-terrorism.

We adopt a zero tolerance to sexual violence and sexual harassment.

### **Scope**

All staff at Learn Plus Us have a duty to comply with this Policy.

This Safeguarding and Promoting the Welfare of Children and Vulnerable Adults Policy covers:

- Learners aged 16 and 17
- Learners who are eighteen years of age and over, and who either permanently or temporarily may be in the need of community care services by reasons of mental or other disability, age or illness and who are unable to take care of themselves, or protect themselves against significant harm or exploitation
- All learners in regard to Prevent where there is concern in regard to people who are at risk of being drawn into terrorist activity
- Providing a service for adult learners to support them to keep safe from by other or themselves

## What to do if you have a Welfare, Safeguarding or Prevent Duty Concern

<p><b>1. Why are you concerned?</b></p> <p>1.1 Disclosure 1.2 Learner's appearance or behaviour 1.3 Witnessed concerning behaviour or incident</p>
<p><b>2. Immediately inform the Designated Safeguarding Lead</b></p> <p>Designated Safeguarding Lead: Jaquie Elsey Manning, 07813 052962 Designated Deputy Safeguarding Lead: Stephen Smith, 07973 147781</p> <p>2.1 Record your initial concern(s) on the Safeguarding Monitoring Form (appendix 3), which can be obtained from a member of the Safeguarding Team (page 3) and email to <a href="mailto:jaquie@learnplusus.co.uk">jaquie@learnplusus.co.uk</a> or <a href="mailto:stephen@learnplusus.co.uk">stephen@learnplusus.co.uk</a> (if the DSO is out of the business) within 24 hours</p>
<p><b>3. Designated Safeguarding Officer (DSO) allocation</b></p> <p>3.1 Within 12 hours of notification the Designated Safeguarding Lead will nominate a Designated Safeguarding Officer (DSO) to carry out a full investigation with all relevant parties 3.2 DSL saves in the completed form in the secure Safeguarding Folder on the File Server</p>
<p><b>4. Full investigation to be conducted by nominated DSO within 24 hours</b></p> <p>4.1 Refer to Safeguarding Policy and supporting documents for guidance 4.2 Conduct a full investigation with all relevant parties 4.3 Complete a full write up on the Safeguarding Concern Form, ensuring that within 24 hours the report has been saved in the secure Safeguarding Folder on the File Server and you have emailed the DSL to confirm that the investigation has taken place and the form is ready for evaluation 4.4 If required, the DSL will speak to the individual and/or their employer 4.5 For under 18 year olds may also liaise with parents</p>
<p><b>5. DSL Evaluation of completed Safeguarding Monitoring Form</b></p> <p>5.1 Designated Safeguarding Lead will evaluate the completed Safeguarding Monitoring Form to ascertain if any further action is to be taken, including a referral to other agencies and informing the ESFA via the Contact Form: <a href="#">Education and Skills Funding Agency (ESFA) enquiry form - Customer type - DFE Online Forms</a> using UKPRN 10028965 as required within 48 hours and contact your ESFA Account Manager 5.2 DSL will update the Safeguarding Monitoring Form accordingly</p>
<p><b>6. DSL and relevant DSO monitor progress with live cases</b></p> <p>6.1 DSL and relevant DSO will monitor progress with live cases and report to the Director of Operations and Quality 6.2 DSL will ensure the Director of Operations and Quality is aware of all live incidents 6.3 DSO to monitor learners and Apprentices who have experienced an incident that has been categorised as wellbeing or something else other than Safeguarding 6.4 If the DSL decides that the incident doesn't need to be reported, the DSO and Tutor will be asked to monitor the situation</p>
<p><b>7. Board Reporting</b></p> <p>7.1 DSL to prepare twice yearly Board reports for the Board Safeguarding Lead (BSL) to present at the May and November Board meetings, these will include a DBS status update 7.2 BSL to make the Board aware of any serious Safeguarding incidents at bi-monthly Board meetings in between</p>
<p><b>8. Accusations about staff and freelancers</b></p> <p>8.1 The options in point 1 could be about a member of staff 8.2 An accusation about a member of staff must be reported directly to the BSL/Managing Director, unless it is about them, in which case it must be reported to the Board Chairperson 8.3 This will not be allocated to a DSO to investigate 8.4 The BSL will carry out the investigation 8.5 The BSL will be support by the Board Chairperson in the evaluation and decision about next steps and reporting, including suspension and invoking the disciplinary process 8.6 Depending on the outcome there will be different actions, the person may be dismissed, the accuser may have made it up or misjudged the situation, monitoring might be part of the plan, changes to job role or learner allocation, this must be reported to the ESFA (<b>see 5.1</b>)</p>

## Safeguarding and Protection Procedures

[numbers refer to table on page 4]

### **[1, 2] Members of Staff and Disclosures of Abuse, Safeguarding, County Lines, Prevent Monitoring by Learners.**

**[1]** An Apprentice or learner may disclose abuse or fear of abuse including county lines or a safeguarding cause for concern, to any member of staff at any time. When this happens, they must follow the procedure set out below. Apprentices and learners have access to up to date contact details for members of the safeguarding team (DSL and DSOs) through the e-portfolio system on each assessment and via wall mounted notices at our training centres.

**[2]** If a child/vulnerable adult learner says they have been abused or at risk due to a safeguarding concern, report this as soon as possible, and within 24 hours to the Designated Safeguarding Lead (DSL) using the Safeguarding Monitoring Form.

**[2]** When a learner discloses abuse or a safeguarding cause for concern, talk to the learner with tact and sympathy. The learner has a right to expect their situation to be dealt with sensitively and sympathetically **[1/2]**.

Where you have lost contact with a learner and they have not turned up for work for a continued period of time and the employer has not been able to make contact either, then you have a responsibility to report this to the DSL so they can investigate further.

Do not offer confidentiality. Make the child/vulnerable adult learner aware as early as possible that you will need to contact the DSL. Reassure them that only those who “need to know” will be given the information. For guidance on how to conduct the conversation with the learner **[please see Appendix 2]**.

**[2]** Do not ask the learner to make a written statement.

**[2]** Make a full written record as soon as possible, including date, time, location of incident, full factual details of the cause for concern or disclosure from the learner and the action you have taken using the Safeguarding Monitoring Form and inform the DSL.

**[1/2]** A learner may disclose to you that another learner or other learners are being abused or that they have been abusing someone. In both cases, The Safeguarding Procedure applies, and the Safeguarding Monitoring form must be filled in as instructed on the form.

### **[1,2] Suspected abuse or safeguarding concern not disclosed by learner**

**[1]** Learn Plus Us recognises that children, young people and vulnerable adults cannot be expected to raise concerns in an environment where staff fail to do so.

**[2]** If you have suspicions that a learner is being abused or is at risk due to a safeguarding issue or you notice a change in their behaviour and/or appearance, but they are keeping it to themselves, do not hesitate to disclose your suspicion to the DSL using the Safeguarding Monitoring form.

### **[3,4,5, 6] The Designated Safeguarding Lead and Disclosures of Abuse, Safeguarding, County Lines, Prevent Cause for Concern**

**[3]** On receiving a completed Safeguarding Monitoring form reporting alleged abuse or safeguarding/Prevent Duty cause for concern, within 12 hours the DSL will allocate it to one of the Designated Safeguarding Officers (DSO) to carry out a full investigation.

**[4]** Within 24 hours the allocated DSO will carry out the full investigation, update the Safeguarding Monitoring form and email to DSL to confirm it is waiting for them to review.

**[5]** The DSL will review and evaluate the information obtained to ascertain if it needs to be formally reported or is more of a misunderstanding/disagreement that be dealt with by LPU. Should it need to be reported the relevant authority and the ESFA, the maximum time scale is 48 hours but ideally this should be completed

within 24 hours; remember a learner or Apprentice is at risk of harm. If the DSL has any doubts or requires support the Board Safeguarding Lead (BSL) must provide the necessary input and help with the decision-making process. In any event the DSL must inform the BSL when reporting incidents to authorities and the ESFA. We have a legal responsibility and duty to report any reportable incidents for those under the age of 18 or vulnerable adults. However, for most of our adult learners they are able to make choices and decisions, information must not be passed on to external authorities unless the learner agrees or the DSL is satisfied that there is a serious risk of harm to self or others. Social Services or the Police will conduct an investigation.

The DSL will discuss with the Social Services Department or the Police what action will be taken to inform the parents/guardian or carer of the learner and a note of that conversation will be made, together with confirmation of any steps that Learn Plus Us has agreed to take regarding interviews or retaining control until the appropriate person arrives.

A written record of the date and time of the report will be made and the report will include the name and position of the person to whom the matter is reported. The telephone report will be confirmed in writing to the Local Authority Social Services Department within 48 hours. The confirmation may be handwritten, posted or faxed but, in any event, a copy of the letter will be kept on the learner's file.

The DSL will notify the BSL immediately if they haven't already been involved.

Written Records - The DSL will complete a written report and retain a copy of:

- The report
- Any notes memoranda or correspondence dealing with the matter, copies of reports, notes etc should always be kept securely locked and kept for a period of 7 years

**[6]** The DSL will wherever possible monitor live cases and keep the BSL updated.

**[6]** If the DSL decides that the incident doesn't need to be reported, they will need to decide if any action is required and with the support of the relevant DSO and Tutor ensure the situation is monitored.

## The Prevent Duty

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 nonviolent extremism.

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.

Learn Plus Us protects Apprentices, learners and employees from radicalising influences and follows the Home Offices 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 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 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

Learn Plus Us is committed to supporting vulnerable learners through its safeguarding agenda in order to prevent potential radicalisation.

Learn Plus Us has engaged positively with the Workshop to Raise Awareness of Prevent (WRAP) to ensure the Safeguarding Officer have the skills and knowledge to refer any Monitoring appropriately.

We work closely with employers to support them with strategies to keep children and vulnerable adults safe and ways to identify changes that might indicate that an individual might be at risk of radicalisation. This is also delivered as part of our Apprenticeship curriculum, making it relevant to individuals and their workplace.

## Channel

Channel is the pre-criminal early prevention multi-agency process designed to safeguard vulnerable people from being drawn into terrorist behaviour. Channel works in a similar way to existing safeguarding referrals. Channel interventions are delivered by local partners and specialist agencies and include a close individualised support package aligned to the family, mentoring, faith groups, sports and other groups.

Learn Plus Us refers to Prevent and Channel using the safeguarding referral process.

<b>Possible signs of radicalisation include:</b>	
<ul style="list-style-type: none"> <li>• The individual's views becoming increasingly extreme regarding another section of society or government policy</li> </ul>	<ul style="list-style-type: none"> <li>• They are observed downloading, viewing or sharing extremist propaganda from the web</li> <li>• They become withdrawn and focused on one ideology</li> </ul>
<ul style="list-style-type: none"> <li>• The individual becomes increasingly intolerant of more moderate views</li> </ul>	<ul style="list-style-type: none"> <li>• The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups</li> </ul>
<ul style="list-style-type: none"> <li>• The individual expresses a desire/intent to take part in or support extremist activity</li> </ul>	

## County Lines

County Lines is when children and young adults are recruited by gangs to cross county lines to deal in drugs, arms and other illegal activities. Most often the victims live in a large city and are sent long distances to deal. Gang leaders' prey on the vulnerable and once involved it is very difficult to leave and in many cases the victims become gang leaders themselves. If a young learner or Apprentices isn't contactable, their parent and

family don't know where they are, they have something going on in their life that makes them more vulnerable than usual, then County Lines should be considered and discussed the DSL and BSL.

The other victims of County Lines are vulnerable people living alone in the County where the dealing is taking place. These people are often people with a disability, including learning disabilities. The gang leader and the young person dealer take over the property they live in and use as the hub for dealing. This is known as Cuckooing and whilst it is out of sphere of influence, having an understanding might just help to piece things together when considering if a young person as got involved with County Lines.

[numbers refer to table on page 4]

**[8] Suspicion, allegation or actual abuse or a safeguarding cause for concern of a learner / child / vulnerable adult by a member of staff**

[8] Staff needed to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with children and vulnerable adults remain, and are seen to remain, entirely proper and professional. It is recognised that staff can be vulnerable to the possible consequences of their close professional relationships with children and vulnerable adults and to the potential for malicious and misplaced allegations being made, whether deliberately or innocently, arising from the normal and proper associations that staff may have with them. All staff should be aware of their duty to raise concerns, where they exist, about the unsafe practice of colleagues in regard to children and young people and vulnerable adults.

[8] Any allegation or suspicion of abuse or a safeguarding concern by a member of staff must be reported directly to the Board Safeguarding Lead (BSL), as soon as possible. The BSL will support the person making the report to complete the Safeguarding Monitoring form.

[8] If the allegation meets any of the criteria of Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021, the BSL shall report it to the Local Authority Designated Officer(s) (Head of Targeted Services) on the same day, as well as the Board Chairperson and the ESFA.

[8] If the allegation concerns a vulnerable adult learner the BSL must report the matter to the Police or local Social Services Department Safeguarding Adults Coordinator where the vulnerable adult is considered to be suffering or is likely to be suffering significant harm.

[8] It is not necessary to make a referral to Social Services or inform the ESFA where an allegation can be shown beyond doubt to be demonstrably false. It is also not necessary to make a referral to Social Services where the allegation is judged to be a trivial nature.

[8] In any case the BSL must take such steps that he or she considers necessary to ensure the safety of the learner who has made the allegation and other vulnerable adults or children or learners who might be at risk. Company disciplinary procedures will be followed, these steps are likely to include:

[8] Suspension is deemed a natural act - safeguarding both the child/vulnerable adult making the allegation and the member of staff, suspension is recommended in the following circumstances:

- A person should be risk
- The allegation is so serious that summary dismissal for gross misconduct is possible.
- It is necessary to allow unimpeded investigation

[8] The ESFA must be informed via the Contact Form: [Education and Skills Funding Agency \(ESFA\) enquiry form - Customer type - DFE Online Forms](#) using UKPRN 10028965 as required within 48 hours and contact our ESFA Account Manager.



## **[8] Suspected Abuse, Safeguarding or Prevent Concern**

**[8]** A member of Staff may make an allegation of suspected abuse or a safeguarding cause for concern of a learner by another member of staff even if the learner does not disclose this abuse. The member of staff who suspects the abuse or safeguarding cause for concern should complete the Safeguarding Monitoring form, with support from the BSL if required and discuss their suspicions with the BSL who will, decide how the matter is to be investigated and what is the most appropriate action to be taken during the period of investigation.

## **[8] Managing the aftermath of unfounded and unsubstantiated allegations**

**[8]** Where it is subsequently found that an allegation was made with malice and aforethought, the BSL will determine an appropriate course of action according to their centre's procedures. This may include disciplinary action against the accuser, acceptance of a written apology subject to agreement about future behaviour or other such sanctions the Director may deem appropriate.

**[8]** Despite the distress caused, children/vulnerable adults who make false allegations may still be entitled to continue to receive full access to the programme. The circumstances of each case will be reviewed on an individual basis.

**[8]** Where remaining in the same organisation as the falsely accused member of staff or the child/vulnerable adult, consideration should be given to the child/vulnerable adult studying elsewhere. Permanent exclusion should be considered only as a last resort.

**[8]** The BSL will make sure that members of staff, who have been subject to false or unsubstantiated allegations, receive either personal or professional support or both.

**[8]** If the investigations have revealed any competency issues then, following disciplinary or capability procedures, support mechanisms or other professional support may be offered e.g. training, in line with the Company's procedures and processes.

## **Role and Responsibilities**

***Board Safeguarding Lead (BSL): Stephen Smith, Director of Operations and Quality.***

The BSL is the lead Board member for Safeguarding and the Prevent Duty. Responsibilities include the delivery of the annual report, updating the board of any serious incidents, supporting the DSL with policy and procedure reviews, ensuring compliance with DBS requirements, monitoring/managing the DSL activities and other support requirements. Additionally, the BSL is the first point of contact for accusations against members of staff.

***Designated Safeguarding Lead (DSL): Jaquie Elsey Manning, Tutor/Learning Support Mentor.***

The DSL is the key person in the organisation and as such takes the lead role in Safeguarding and the Prevent Duty, ensuring the Company meets its statutory duties within the:

- Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2021 - [Keeping children safe in education 2021 \(publishing.service.gov.uk\)](#)
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) July 2018 - [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](#)

- What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- Sexual violence and sexual harassment between children in schools and colleges (DfE Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads September 2021 - [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- Prevent duty guidance: DfE for further education institutions in England and Wales April 2021 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Also, the national Framework of Standards for Safeguarding Adults by:

1. Providing professional advice, support and guidance to DSOs and staff regarding any suspicion of abuse, if a young person or vulnerable adult makes a disclosure or in relation to the possible abuse of trust
2. Provide professional advice, support and guidance to DSOs and staff regarding causes for concern other than abuse with regards to children and vulnerable adults
3. Gathering statements and information regarding child and vulnerable adult safeguarding issues and ensure that records are kept safely and securely
4. Making decisions, in consultation with the Director of Operations and Quality, regarding appropriate action
5. Sharing information and making referrals with Children's Social Care or the safeguarding
6. Vulnerable Adult Coordinator at Social Services, where appropriate, to support child protection enquiries and children in need assessments as well as safeguarding vulnerable adult learner enquiries
7. Monitoring learners after a referral is made and ensuring that the Company is adhering to any work agreed with Social Services or other agencies
8. Producing a bi-annual report, for the Board that reviews how the duties have been discharged
9. Liaising with the local Safeguarding Children Boards and relevant Safeguarding Boards
10. Ensuring that everyone with substantial access to children and vulnerable adults will have training on indicators of abuse, good practice, practices never to be sanctioned and any changes in legislation
11. Ensuring all employed and freelance staff has a current enhanced DBS certificate and a register is maintained
12. Ensuring all staff, managers and Directors have suitable annual update training
13. Undertaking annual update training on the role of Designated Safeguarding Lead

Designated Safeguarding Lead. (DSL): Melanie Payne, Tutor

***Designated Deputy Safeguarding Lead (DDSL): Stephen Smith, Director of Operations and Quality***

The DDSL covers for the DSL when they are away from the business.

***Designated Safeguarding Officer (DSO): Janet Dawson, Business Development Executive***

1. The DSOs will carry out allocated investigations and report findings by updating the Safeguarding Monitoring form
2. Providing professional advice, support and guidance to staff regarding any suspicion of abuse, if a young person or vulnerable adult makes a disclosure or in relation to the possible abuse of trust
3. Provide professional advice, support and guidance to staff regarding causes for concern other than abuse with regards to children and vulnerable adults
4. Gathering statements and information regarding child and vulnerable adult safeguarding issues and securely passing the information to the DSL

5. Making decisions, in consultation with the Director of Operations and Quality, regarding appropriate action
6. If requested to do so by the DSL, sharing information and making referrals with Children's Social Care or the safeguarding
7. Monitoring learners after a referral is made and ensuring that the Company is adhering to any work agreed with Social Services or other agencies
8. Undertaking annual update training on the role of Designated Safeguarding Officer

#### **HR Administrator:**

As part of our approach to Safer Recruitment the HR Administrator (HRA) is responsible for ensuring all new employees and freelancers have a current DBS check at the level appropriate for their role. This includes working with the individual to submit a check or checking on the Update Service. We expect all employees and freelancer to enrol for the Update Service. The HRA will pass any disclosures onto the Head of Operations and Quality or the Managing Director in order that a decision can be taken about the continuation of a job offer or employment.

The HRA carries out checks to confirm that they are eligible to work in the UK and they carry out identity checks using documents such as birth certificates, marriage/divorce certificate, passports, bank statement and utility bills.

The HRA also take up references for all new starters, this is important because there might be something of relevance to safeguarding or the Prevent Duty that needs to be considered in relation to confirming employment with LPU.

The HRA ensures that we adhere to our safer recruitment process which includes guidelines for advertising roles, clearly stating our commitment to safeguarding and identifying the DBS requirement, CV check and checking gaps in employment history, a completed application form (we will only progress applicants that complete our application form) and qualification checks. When shortlisting candidates, the HR Administrator ask the candidate to declare in writing, if they have a criminal record or if they are on the barred list.

#### **All Staff Members:**

Accept and recognise their responsibilities in relation to good practice and the reporting of suspected poor practice and allegations or monitoring about abuse.

Report issues of concern with learner's behaviour and attention. Complete the Safeguarding Monitoring form and gives to the DSL for recording and consideration/monitoring. Issues which need to be reported are as follows:

- Learners' non-attendance at the training centre, on-line sessions and work placement. This will include when contact on all contact numbers including emergency contacts leads to no contact being made via telephone, email and at their workplace
- Change of behaviour: change in appearance, change in attitude/mood, not attending when they are a regular attender with no reason given, learner commenting and sharing information of concern where they may be getting themselves into dangerous situations, alcohol/drugs abuse, criminal behaviour, etc.
- Be ready and receptive to learners who wish to make a disclosure of abuse and to comply with this procedure
- Disclose to the DSL all relevant information
- Attend meetings as required
- Undertake training on Safeguarding as part of induction and as required for updating.
- All Tutors need to ensure that they discuss with learners the procedures for safeguarding. All inductions of courses include information about the Safeguarding team and how to contact the DSL and DSOs

## Staff Induction and Training

All staff undertake a staff induction where they undertake safeguarding training and read the policies of Learn Plus Us. The staff will also have an induction with the DSL to discuss the procedures and to be able to ask questions and ensure that they understand their responsibilities fully. All new staff will complete the ETF online certificated courses or similar.

All staff need to be willing to undertake training on safeguarding and prevent duty and need to take responsibility of keeping themselves up to date and be aware of the safeguarding policies and channels to take to deal with situations confidentially when they arise. Training will be undertaken and updated regularly (at least annually and when changes and developments in government and local policy occur).

## Confidentiality

The child or vulnerable adult should be informed at the earliest possible stage of the disclosure and that the information will be passed on. Staff must not discuss the case with anyone other than those involved in the case.

Learn Plus Us complies with the requirements of the Data Protection Act 2018, which allows for disclosure of personal data where this is necessary to protect the vital interests of a child or vulnerable adult. However, Learn Plus Us is also mindful of the requirements of GDPR and ensures that the information is shared with consent from learners and that the confidential information is stored securely and with limited access only by those who need to know. Arrangements have been made by Learn Plus Us to ensure that the pre-pandemic records are stored in locked storage cabinets, and since March 2020 stored securely on the File Server and that only relevant information is kept.

## E-Safety (staying safe on-line)

The internet is an important education tool, but also carries risks associated with unwanted contact and bullying, inappropriate content, commercial exploitation, financial fraud and radicalisation toward extremism and terrorism.

Learn Plus Us safeguarding responsibilities extend to the digital world, so that we can maximise the opportunities of digital technology and help young people and vulnerable adults to use the internet safely and responsibly. This has been made a greater focus as a result of the COVID-19 pandemic, starting with an enforced national lockdown in March 2020 and resulting all teaching, training and learning moving to virtual/remote online platforms. During this period we adopted the international sign for 'signalling for help – hand gesture' for learner to be able make us aware that they are in danger and need urgent assistance, this is aimed at supporting learners and Apprentices that are working and learning from home, but home is not a safe place for them.



Learn Plus Us e-Safety processes are consistent with best practice. There is a focus on raising awareness and understanding of e-Safety issues against learner via the safeguarding team and the curriculum. This will include the availability of e-Safety resources for learners as well as improving safe access at Learn Plus Us.

At Learn Plus Us we monitor the use of IT strictly and have controls set on computers so that there are restrictions to the types of sites that are accessible. Computer histories, for our head office-based learner IT suite are checked weekly and staff make regular checks of the websites accessed during the learners' time at the Centre. If a learner is found accessing a site which is of concern this will be reported to the Safeguarding Team. During the lockdown our IT training suite was closed, and learners were participating remotely using their own equipment. However, since returning to the face-to-face training and relocating our head office and training centre checks have resumed.

### **Contact and Monitoring of Young People (aged 16 to 18)**

At Learn Plus US the health and wellbeing of our learners is paramount and the contact and monitoring of young people whilst on programme is of the utmost importance. The Tutors are required to ensure that they have contact with the Young People on a weekly basis and that they ensure that the support network for the young people is in place and is working to safeguard their welfare. Also, it is the responsibility of the Tutors and the Safeguarding Team to report and follow up on any Monitoring to ensure that appropriate action is taken. Please see Appendix 4 for the full process.

### **Relevant linked Policies**

- Health and Safety
- Covid-19 (Coronavirus)
- Lone Working
- Driving for Work
- Disciplinary

## Appendix 1

### DEFINITIONS OF ABUSE AND SAFEGUARDING ISSUES

**Physical abuse** is usually the use of force to cause pain and injury and signs might include burns, bruising, scratches, or accidents that cannot be explained. Also included is misuse of medication or when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child or vulnerable adult.

**Emotional Abuse** is the persistent emotional ill treatment such as to cause severe and persistent adverse effects on emotional development. Some of the signs of emotional abuse are:

- Being withdrawn
- Suddenly behaving differently
- Anxiety
- Clingy or depressed
- Aggressive
- Problems sleeping, nightmares
- Eating disorders, changes in eating habits
- Obsessive behaviour
- Taking risks
- Poor attendance
- Drug/alcohol abuse
- Self-harm
- Thoughts of suicide

**Psychological Abuse:** such as threats of harm or abandonment, humiliation, blaming or controlling behaviour, verbal insults, enforced isolation, intimidation and coercion. Some of the signs of emotional abuse are:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment
- Anxiety
- Poor attendance

**Discriminatory Abuse:** this includes any sort of abuse based on vulnerable adults or child's race, gender or impairment such as their mental or physical health.

**Sexual Abuse** includes rapes and sexual assaults to which the vulnerable adult or child/vulnerable adult has not consented, or could not consent, or was pressurised into. Signs can include changes in behaviour, using sexual language or physical discomfort. It may also include encouraging children and vulnerable adults to behave in sexually inappropriate ways. Most of LPU's Apprentices are over the age of 18 and whilst they could still be victim of sexual abuse, to meet our legislative and moral duties we must ensure those classified as children (16 and 17 year olds) are given support and guidance in relation to how to avoid and/or report Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) and our staff are trained to help them identify any such abuse and know the procedure for reporting it.



**Peer to Peer Abuse** related to Apprentices of 16 and 17 years of age and essentially includes a broad range different types of abuse as outline in the section, but in this case, it is a child abusing another child. The is unlikely to occur at LPU because of our curriculum and training delivery style, however it's important that teaching staff have an awareness and can monitor if anything occurs in the Apprentices workplace or in a group teaching/training session. As with all other types of abuse our staff need to know how to report a concern.

**Neglect and Acts of Omission** are when a vulnerable adult or child does not have their basic needs met, such as adequate food or warmth or help with personal hygiene. It may also include inadequate shelter including exclusion from home or abandonment, failure to ensure adequate supervision including the use of inadequate carers, or the failure to ensure access to appropriate medical care or treatment. Signs might include deteriorating health, appearance or mood.

**Institutional Abuse:** this is poor professional practice in an institution designed to safeguard both children and adults and include neglect. It can take the form of isolated incidents rights through to ill treatment or gross misconduct.

**Financial or Material Abuse:** this is when a child/vulnerable adult is exploited for financial gain. It includes theft, fraud, exploitation, misuse or misappropriation of property/finance etc.

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

**Extremism:** The Government has defined extremism in the Prevent strategy as; 2 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 the armed forces".

There are signs and indicators to look out for which may be signs of radicalisation and the other types of abuse:

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with children who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretaries and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Joining or trying an extremist organisation

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episode when the victim may have been trafficked or the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>[1]</sup> should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**Domestic Violence:** The suffering of domestic violence or an individual being subject to observing someone else being abused is also of concern. In this situation the individual may be displaying physical signs of abuse, aggressive behaviour, anti-social behaviour, suffering depression or anxiety, not doing well due to lack of concentration and disruption moving to and from home and shelter. It maybe that the individual displays changes in behaviour from what is the norm for them.

This could include:

- Refusing to have the camera on for on-line sessions
- Being withdrawn
- Suddenly behaving differently
- Anxiety
- Clingy or depressed
- Aggressive
- Problems sleeping, nightmares
- Eating disorders, changes in eating habits
- Obsessive behaviour
- Taking risks
- Poor attendance
- Drug/alcohol abuse
- Self-harm/ thoughts of suicide

**Other Safeguarding issues may also be recognised in the specific circumstances identified below:**

This is not an exhaustive list.

- Child pornography and the Internet
- Forced marriage of a child
- Young carers
- Looked after children and children living away from home
- Pregnancy of a child

## Appendix 2

### GUIDELINES FOR STAFF ON DEALING WITH DISCLOSURES OF ABUSE OR ABUSE OF TRUST

#### Do

- Be ready to listen to what the person is saying. Reassure the person; acknowledge that they may have been brave to tell you
- Make sure the person is comfortable in a secure environment where they cannot be overheard or interrupted
- Take what they say seriously
- Offer practical help i.e. a glass of water or tissues
- Remind the child, young person or vulnerable adult that you have a duty to follow procedure in order to safeguard and support them and that you will inform the Designated Safeguarding Lead (DSL)
- Reassure them that only those who “need to know” will be privy to the information
- Tell them what the next steps will be after you have spoken to the DSL
- Refer the matter to the DSL
- Confirm the details of the disclosure in writing as soon as possible, as accurately as possible and ensure that the time, place and date are noted and that the account is signed
- Avoid any delay in reporting the cause for concern or disclosure to the DSL as this could increase the risk to the learner and to other family members or other learners
- Where abuse is suspected but not disclosed by the learner, the member of staff should report their Monitoring to the DSL

Note; if the disclosure or staff members’ allegation is about a member of staff (employed or freelance), it must be reported directly to the Board Safeguarding Lead.

#### Don’t

- Do not offer confidentiality or to keep what you are being told secret
- Don’t appear to be shocked or upset by what the child, young person or vulnerable adult is telling you, even if what they are saying is distressing
- Don’t touch the person to comfort or reassure them
- Don’t question the person about the alleged abuse, beyond the minimum necessary to understand what is being alleged
- Don’t give false reassurances in order to comfort the person
- Don’t take the person back home

Appendix 3

## SAFEGUARDING MONITORING FORM

This is the form to complete if you have a welfare concern regarding a learner which may develop into a Safeguarding issue<sup>1</sup>.

Details of Person of concern					
Surname					
Forenames					
Current Address					
Current Address					
Current Address					
Post Code		Email		Mobile:	
Category of Concern	<input type="checkbox"/> Financial <input type="checkbox"/> Direct Physical Abuse <input type="checkbox"/> Neglect <input type="checkbox"/> Housing <input type="checkbox"/> Direct Emotional Abuse <input type="checkbox"/> Psychological Abuse <input type="checkbox"/> Domestic Violence <input type="checkbox"/> Direct Sexual Abuse <input type="checkbox"/> Prevent referral <input type="checkbox"/> Other _____ (radicalisation, extremism, terrorism concern)				
Overview of Concern	<p><b>Notes for completion:</b> Please ensure that when you write the description of the concern. Please add details as to what has happened, including details such as dates and times, examples of indicators and signs which have been displayed in their behaviour and what you believe or have witnessed happening to cause the concern.</p>				
Information regarding the concern. Please provide as much information as possible					

<b>Continuation of additional information of concern</b>				
<b>Form completed by:</b>	<b>Name</b>		<b>Date</b>	
<b>Review and Decision Section</b>				
<b>Signature Section</b>	Name		Date	
	Signature			

**Appendix 4**

**Flow Chart: Process for the Contacting of High-Risk Learners including those under the age of 18**

