

SEMESTER: LEARNING & DEVELOPMENT

SAFEGUARDING/PREVENT POLICY

Safeguarding / Prevent Policy Statement

Semester: Learning & Development Ltd committed to the safeguarding and well-being of all our learners and fully recognises its responsibilities for protecting all vulnerable groups including identifying those that may be at risk of radicalisation and extremism. Our policy applies to staff, learners, contactors, visitors and volunteers working on behalf of or in conjunction with Semester: Learning & Development Ltd.

There are five main elements to our policy:

- Ensuring we operate safer recruitment practices in accordance with the legislative document Safer Recruitment, Safeguarding Children in Education (2007) and under the new Prevent Duty Guidance 2015.
- Raising awareness of Safeguarding / Prevent throughout the organisation and ensuring staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.
- Raising awareness of safeguarding / Prevent to all our learners and ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
- Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse and radicalisation
- Establish safe environments in which vulnerable groups can learn and develop

We recognise that because of occasional face to face contact with some learners, our staff are well placed to observe the outward signs of abuse and radicalisation. Semester: Learning & Development will therefore:

- Establish and maintain an environment where learners feel secure, are encouraged to talk, establish & maintain an environment where learners feel secure, are encouraged to talk and are listened to
- Ensure learners know that there are designated staff within Semester whom they can approach if they are concerned or worried.
- Include opportunities within our ongoing assessment process for learners develop their skills that they need to recognise and stay safe from abuse.
- Ensure that appropriate members of staff have an understanding of the factors that make people vulnerable to being drawn into terrorism and are able to challenge extremist views along with other actions to respond in a positive way.

We recognise and adhere to the statutory requirements within the following important and relevant pieces of safeguarding legislation and guidance:

- Working Together to Safeguard Children (2010)
- Children's Act (2004)
- Safeguarding Children and Safer Recruitment in Education (2007)

- Safeguarding Vulnerable groups Act SVGA (2006 amended 2012)
- Protection of Freedoms Act (2012)
- Discloser and Barring Service Code of practice (2012)
- Sexual Offence Act (2003)
- Every Child Matters (2004)
- Equality Act (2010)
- Section 26 of the Counter Terrorism and Security Act 2 2015
- Revised Prevent Duty Guidance July 2015
- Channel Duty Guidance 2015

To support our commitment to the Safeguarding / Prevent and the well-being of all of our learners and with regard to the above legislation we will;

- Ensure that we have a Designated Person for Safeguarding / Prevent who has received appropriate training and support for this role. The designated Person for Safeguarding / Prevent is **Scott Margison**.
- Ensure that all staff and learners are aware of our Designated Person for Safeguarding / Prevent. This will be communicated via our staff and learner induction process, internal training and awareness sessions, via the learner handbook.
- Ensure all staff are aware and understand their responsibilities in relation to Safeguarding / Prevent and in being alert to the vulnerability signs and indicators of abuse or radicalisation and understand how the actions they can apply in response before referring any concerns to the Designated Person for Safeguarding / Prevent.
- Ensure that effective Safeguarding / Prevent procedures are developed, implemented and monitored to ensure effectiveness. The Safeguarding procedures are based on the 5R's approach of Recognition, Response, Record, Report, Refer. And the Prevent procedure will adopt the ethos of "Notice, Check, Share" where there are concerns that an individual may be vulnerable.
- Ensure we develop effective links with relevant external agencies, local Safeguarding and Prevent Channel boards and co-operate with any requirements with any safeguarding referral matters.
- Ensure that we keep written records of Safeguarding / Prevent concerns, even when there is no need to refer the matter to the relevant parties.
- Ensure all records are stored securely and in accordance with Data Protection Act.

Semester: Learning & Development Ltd recognises its responsibilities with regard to the Safeguarding of young and vulnerable learners from abuse and from inappropriate and inadequate care, and is committed to responding in all cases where there is concern. It also recognises its responsibilities for identifying signs of young people being drawn into terrorism or extremist activity and are committed to responding in all cases.

Due to the nature of our work Semester: Learning & Development Ltd may be in the frontline of work with young learners, vulnerable learners and vulnerable adults.

This may mean that we are the first to know that a young or vulnerable learner or adult is being or has been abused or that we are concerned about a person's well-being. We may also be the first to recognise changes in behaviours that are the signs that a vulnerable learner is being drawn into activities that could be considered as extremist and likely to be in opposition to British Values. Everyone has an equal responsibility to ensure that the individual's needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests on the Directors, Senior Management and Designated persons for Safeguarding / Prevent but also with every individual member of staff employed or volunteering within our organisation whilst at work, at an employers' premises or at home.

We will ensure that our Safeguarding / Prevent Policy and associated Procedures are reviewed at least annually to ensure that they are still relevant and effective.

Understanding Safeguarding

What is Safeguarding?

Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and vulnerable learners.

Safeguarding may involve instances in which a young or vulnerable learner is suffering or likely to suffer harm.

Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

What are the benefits of effective Safeguarding?

When learners feel safe and secure they can concentrate on learning.

Learners can rely on those people in positions of trust.

Staff are protected from malicious and misplaced allegations.

Staff are clear about individual responsibilities, roles and boundaries.

Learners are appropriately protected and all issues are dealt with effectively

How do we define Young/Vulnerable learners?

Young learners are defined as any learner who has not yet reached their 18th Birthday (Children's Act 1889,2004).

The safeguarding Vulnerable Groups Act SVGA (2006) no longer labels adults as "vulnerable" because of the setting in which an activity is received, nor because of the personal characteristics or circumstances of the adult receiving the activities.

The definition of regulated activity as explained within Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean the adult will be considered "vulnerable" at that particular time.

New definition of regulated activity relating to adults

An adult is a person aged 18 years or over. There are 6 categories within the new definition of regulated activity:

1. Health Care
2. Personal Care
3. Providing Social Work
4. Assistance with General household Matters
5. Assistance in the Conduct of a Person's own Affairs
6. Conveying

Definitions and types of Abuse or Neglect

This section closely reflects the procedures and guidance in Home Office document "*working together to safeguard children*"

"Child abuse and neglect" is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual abuse and sexual assaults as well as cases where the standard of care does not adequately support the person's health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner.

Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm

Young or vulnerable learners may be abused in the family or an institution or community setting by those known to them or, more rarely by a stranger. An adult or adults or another child or children may abuse them.

Working together to safeguard children (2010) sets out definitions and examples of the four broad categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately causes illness.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on them.

These may include interactions that are beyond the persons developmental, capacity causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all maltreatment of a person, though it may occur alone.

Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

Neglect

Neglect involves the persistent failure to meet a person's basic or physical and/or physiological needs, likely to result in the serious impairment of the person's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person's basic emotional needs.

Additional types of abuse and unsafe activities which we recognise and which have become more prevalent in recent times are:

- Bullying and Harassment
- Discriminatory Abuse
- Financial Abuse
- Domestic Violence

- Alcohol and Drugs
- Crime
- Cyber-bullying

Signs and indicators of possible Abuse

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, there are a number of possible indicators. However, there may be a perfectly reasonable explanation so it is important to remain vigilant but not be over zealous nor jump to conclusions.

There may also be no signs or indicators of abuse, however, this does not necessarily mean a report of abuse is false.

Signs suggesting physical abuse

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because playing a contact/rough sport etc.
- Injuries that have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illness, unkempt appearance, dirty clothes etc.
- Changes in routine

Signs of sexual abuse

- Any allegation made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe Sleeping disorders
- Eating disorders

Signs suggesting emotional abuse

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour
- Persistent tiredness
- Running away

Understanding Prevent

Background

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity.

Context

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. Colleges, and other organisations that interact with young people, should be aware of these risks and be familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

Definition of Radicalisation

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence.” Driving factors behind radicalisation can include: Lack of integration and/or polarisation Identity crises and/or isolation Political and/or democratic disenfranchisement Discrimination Foreign policy and/or international crises or disputes Political movements Ideologies and/or faiths

Who are we safeguarding?

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing them in.

This raises the question of what will those signs of radicalisation look like: They will look a lot like troubling behaviour: Emotional – angry, mood swings, new found arrogance Verbal – expressing opinions that are at odds with generally shared values Physical – appearance (tattoos), change in routine

What to do if you believe someone to be at risk of radicalisation

The Independent Windscreen Academy will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable.

Notice – Recognition of any changes in behaviour or appearance similar to those outlined above

Check – Speak with someone you trust like a tutor and see what they recommend but trust your instinct if you are still concerned

Share – Speak to one of the named contacts to report your concerns. Remember trust your instinct

If you are a student and concerned about another student, please “**Check**” with your tutor in the first instance and “**Share**” with the Designated Person for Safeguarding / Prevent

If you are a student and are concerned about a member of staff, please “**Check**” and “**Share**” with the Designated Person for Safeguarding / Prevent

If you are a member of staff and are concerned about a student, please “**Check**” and “**Share**” with the Designated Person for Safeguarding / Prevent.

If you are a member of staff and are concerned about another member of staff please “**Check**” with your line manager and “**Share**” with the Designated Person for Safeguarding / Prevent and “**Share**” with the Director of Semester: Learning & Development.

If you are a member of staff and are concerned about a person who is not a member of Semester: Learning & Development Ltd please “Check” and “Share with the Director.

Responsibility for contacting PREVENT

Any of the following people are responsible for making decisions to contact the Counter Terrorism Security Advisers at South Wales Police if serious concerns are raised about a student: The Designated Safeguarding and Prevent Person, The Director of Semester: Learning & Development Ltd.

Any of the following people are responsible for making the decision to contact the Counter Terrorism Security Advisers at South Wales Police if serious concerns are raised about a member of staff: The Designated Safeguarding and Prevent Person, The Director of Semester: Learning & Development Ltd.

Any of the following people are responsible for making the decision to contact the Counter Terrorism Security Advisers at South Wales Police if serious concerns are raised about a person who is not a member of staff e.g. guest speaker: The Designated Safeguarding and Prevent Person, The Director of Semester: Learning & Development Ltd.

Safer Recruitment

Semester: Learning & Development Ltd. will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007), Safer Practice, Safer Learning document produced by NIACE and Prevent Duty Guidance 2015

When interviewing potential staff we will ensure that:

- There is an open recruitment process
- There is a rigorous interview with specific questions relating to Safeguarding / Prevent
- Applicants identify and claims to academic and vocational qualifications will be verified
- References will be taken up by direct contract with referees
- Evidence of the date of birth and address of the applicant will be obtained
- Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted.
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Where a position requires an Enhanced DBS check this will be made clear on the job advert and applicant form and a statement explaining Semester: Learning & Development Ltd's commitment to Safeguarding / Prevent will be documented. All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

During Interview the panel will explore:

- The applicant's attitude and demeanour towards young or vulnerable learners
- The applicant's ability to support our commitment to safeguarding and promoting the welfare of young and vulnerable learners.
- Any gaps in the applicants employment history
- Any concerns or discrepancies arising from the information obtained

Post appointment

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this to be:

- Provide awareness and explanations of relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities.
- Enable individual line managers and colleagues to recognise any concerns about the persons ability or suitability from the outset and address them if deemed appropriate.
- Ensure that individuals are aware of reporting concerns and who the Designated persons for Safeguarding / Prevent are
- Ensure that individuals are aware of other relevant policies and procedures; i.e. disciplinary procedure, E & D policy, Health and Safety etc.

External Speakers and Events Policy

Semester: Learning & Development recognises that there may be times when staff and learners will be exposed to the views of external speakers either invited into deliver training or through external events. Through the Prevent Risk assessment and this External Speakers and Events Policy it aims to eradicate or minimise the risk of learners being exposed to extremist ideas in order to protect the welfare of staff and learners.

Any decision to invite an external speaker to deliver a guest presentation or to host/attend an event will be officially proposed through the Director and will consider the following:

- The speaker or event is being organised is necessary to expose the learner to new experiences and challenges and is totally necessary to the delivery of the learners programme of study
- The speaker / organisation and event does not provide support or a platform for the encouragement of extremist ideas that could lead to a learner being radicalised and terrorists activity
- The views of the speakers are not considered to constitute extremist views like to draw people into terrorism but at the same time do allow the speaker and learners to express their views under the boundaries of freedom of speech.
- If it is not clear following thorough checks that the views of speakers are likely to be extremist then the event will not be allowed to proceed
- If during a presentation / event speakers with extremist views are challenged with opposing views are challenged with opposing views during the event and a contingency in place to close the event should this be deemed necessary

Procedure to undertake following a young or vulnerable learner confiding about or suspecting a case of abuse, neglect or radicalisation

Where a young or vulnerable learner seeks out a member of staff to confide in and share information about abuse, neglect and radicalisation or talks spontaneously individually or in groups, our staff will:

- Listen carefully to them, and not directly question him/her
- Give them time and attention
- Allow the person to give a spontaneous account: do not stop person who is freely recalling significant events
- Make an accurate record of the information given taking care to record timing, setting and people present, the person's presentation as well as what was said. Do not discard that as it may be later needed as evidence.

- Use the persons own words where possible
- Explain they cannot promise not to speak to others about the information they have shared

Reassure the person that:

- You are glad that they have told them
- That he/she has not done anything wrong
- What you are going to do next
- Explain that help will need to be sought to keep them safe

The person should NOT be asked to repeat his/her accounts to anyone.

The Designated Person for Safeguarding / Prevent must be informed immediately, who will investigate the concern and take appropriate action, all records of the investigation, will be kept strictly confidential and stored in a secure place.

Outside agencies and resources in Child Protection can and will be used to assist the company

Regional Prevent Coordinators

The refocused Prevent strategy recommended the appointment of regional coordinators to facilitate engagement between different organisations at a local level. Contact details for each regional coordinator can be found below. The coordinators provide information on the Prevent strategy, details of training courses related to Prevent (such as Workshop To Raise Awareness of Prevent - WRAP) and links to relevant stakeholders in each region including the local authority.

Counter Terrorism Security Advisers
W.E.C.T.U
P.O. Box 128
Bridgend
CF31 3XP

Or email: CTSA@south-wales.pnn.police.uk

Procedure for dealing with allegations against staff

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:

- Behaved inappropriately in a way that has harmed or may have harmed a learner
- Possibly committed a criminal offence against or related to a learner
- Behaved towards a learner in a way that indicates he/she is unsuitable to work them.

The Designated Person should be informed of the matter immediately, (where the Designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed).

An investigation will take place which:

- Will determine if the police need to be involved immediately to protect the person further.
- Will record all details received and secure them safely
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation
- Will determine whether suspension is appropriate whilst undertaking the investigation.

All allegations will be acted upon, however due to the variance in the risk levels. As allegations will be treated individually and the appropriate actions assigned on a case by case basis

Anonymous Allegations

Concerns raised anonymously tend to be far less effective, and depending on the levels of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided

Staff Code of Conduct

The code of conduct should guide all actions taken by staff and anyone else working on behalf of Semester: Learning & Development Ltd. If it is necessary to act contrary to it (for example

visiting a learner in the home) you should only do so after discussion and approval with your line manager.

- Place the safety and well-being of learners first – before any organisation or personal goals and before any loyalty to colleagues or friends
- Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been appropriate
- Be committed to actively preventing the exploitation, abuse and radicalisation of young or vulnerable learners
- Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), ability and treat each individual learner with respect and dignity
- Respect each learners boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem.

The focus of your relationship with any learner you have met through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship and you should avoid socialising with learners with learners on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Twitter or Facebook

- Do not take illegal drugs whilst at work, do not drink alcohol prior or during contact with learners, tobacco product or any form of drug or medication. You should not assist learners in anyway in obtaining these items.
- Do not engage in or tolerate the bullying or harassment of any person
- Never engage in or tolerate inappropriate physical activity such as “horse play”
- Ensure lone working with young or vulnerable learners is undertaken with caution and awareness in mind.

It is essential to have guidelines to follow in order to minimise the possibility for abuse, misunderstanding and misinterpretation. False examples will help create a positive, transparent culture and climate.

- Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners
- Do not make sexual or discriminatory comments of any kind
- Engage in rough or sexually provocative games
- Make sexual comments/innuendos
- Lending or borrowing money or property
- Exclusive or secretive relationships
- Inviting young or vulnerable learners into your home
- Inappropriate reading materials/internet use
- Unacceptable forms of restraint

All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable learners.

If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable learner who is upset and administering first aid are examples of necessary and acceptable behaviour.

Employees should, however, endeavour to minimise any possible misunderstanding of their actions.