

## Safeguarding & PREVENT Policy December 2018

Haddon Training is committed to providing a secure environment for all learners and staff. All adults at HT recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not. Haddon Training Ltd aims to create a culture of vigilance.

In adhering to this policy, and the procedures therein, staff and visitors will contribute to HT's delivery of the outcomes to all learners, as set out in s10 (2) of the Children's Act 2004.

This Policy is one element within our overall organisational arrangements to safeguard and promote the welfare of all learners and staff in line with our statutory duties set out at s175 of the Education Act 2002.

This Policy also draws upon the guidance contained in DfE Guidance 'Keeping Learners Safe in Education, 2018', Working Together to Safeguard Children 2018; and specifically DCSF Resources 'Learning Together to be Safe', 'Prevent: Resources Guide', 'Tackling Extremism in the UK', DfE's 'Teaching Approaches that help Build Resilience to Extremism along Young People' and Peter Clarke's Report of July 2014. Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE July 2018)

### INFORMATION SHARING AND CONFIDENTIALITY

Our Safeguarding and PREVENT policy takes into account the GDPR and Data Protection Act 2018. Please refer to the Flowchart of when and how to share information.

### Policy Statement

It is this company's Policy to treat all employees fairly and equally, regardless of their sex, gender reassignment status, sexual orientation, religion or belief, marital status, civil partnership status, age or perceived age, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, it is the company's responsibility to ensure the safety of all staff and learners from physical, sexual, psychological or emotional, financial, neglect or discriminatory abuse.

Through this policy and procedure and the training and development of managers and staff, the company will do all it can to promote good practice in this area in order to reduce the likelihood of abuse occurring.

**Abuse: is a violation of an individual's human and civil rights by any other person or persons. It may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent.**

This document covers safeguarding our learners from abuse.

Abuse is broken down into the following areas:

### **Physical Abuse**

This may include, but is not limited to, hitting, slapping, pushing, kicking, and misuse of medication, restraint or inappropriate sanctions.

Some of the recognised signs of abuse are:

- unexplained burns;
- scratches;
- bruising and abrasions;
- drowsiness from misuse of medication; and
- anxiety in the presence of an abuser.

### **Sexual Abuse**

This may include, but is not limited to, rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting including so called **Honour Based Violence**. HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or community. Where staff are concerned that a child may be at risk of HBV they must contact the Designated Safeguarding Lead as a matter of urgency.

HBV includes Female Genital Mutilation, forced marriage and practices such as breast ironing.

FGM refers to procedures that intentionally alter, or cause injury to, the female genital organs for non-medical reasons. FGM risk factors include:

- low level of integration into UK society
- mother or sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special procedure' to become a woman

Symptoms that FGM may have already taken place:

- difficulty walking, sitting or standing
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from learning with bladder or menstrual problems
- talking about pain or discomfort between her legs

**THERE IS A MANDATORY DUTY (THE SERIOUS CRIME ACT 2015) FOR EDUCATION PROFESSIONALS TO NOTIFY POLICE WHEN THEY DISCOVER THAT FGM APPEARS TO HAVE BEEN CARRIED OUT ON A GIRL UNDER 18 AND TRAINER COACHES MUST PERSONALLY REPORT THIS. This duty does not apply to at risk or suspected cases.**

Sexual abuse also includes forcing a person to look at pornographic materials.

Some of the recognised signs of sexual abuse are:

- changes in behaviour;
- sexually transmitted diseases;
- difficulties in walking or sitting; and
- sexualised behaviour

## Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the recognised signs of sexual exploitation are:

- appearing with unexplained gifts or new possessions
- older boyfriends or girlfriends
- Sexually transmitted infections
- Drug and alcohol misuse
- Missing education or missing from home

Further information is available in the DfE 2017 Definition and Guide for Practitioners [www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners](http://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners)

The statutory definition of Child Sexual Exploitation can be found in 'Working Together to Safeguard Children (2018)

## Psychological/Emotional Abuse

This may include, but is not limited to, emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Some of the recognised signs of psychological or emotional abuse are:

- fear;

- passivity;
- confusion;
- apathy;
- lack of eye contact;
- low self-esteem;
- disturbed sleep patterns; and
- reluctance to talk openly.

### **Financial or Material Abuse**

This may include, but is not limited to, 'theft, fraud, exploitation, pressure in connection with financial transactions, or the misuse or misappropriation of property or possessions.

Some of the recognised signs of financial or material abuse are:

- loss of jewellery and personal property;
- lack of money to purchase basic items;
- a bill not being paid when money is entrusted to a third party;
- inadequate clothing;
- unexplained withdrawal of cash; and
- loss of money from a wallet or purse.

### **Neglect and Acts of Omission**

This may include, but is not limited to, ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life such as medication, adequate heating and nutrition.

Some of the recognised signs of neglect and acts of omission are:

- dehydration;
- infections;
- malnutrition; and
- hypothermia
- lack of suitable clothing

### **Discriminatory Abuse**

This may include, but is not limited to, abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.

Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse.

### **Children Missing From Education**

All children under 18 are required by law to remain in education or training until they reach the age of 18. We monitor attendance carefully and address poor or irregular attendance without delay. Work Placements (for Traineeships) and employers (for Apprenticeships) are asked to notify Haddon Training if a learner has any unauthorised absence exceeding 10 days.

If a learner aged under 18 has a continuing unexplained absence HT's procedure is to:

- report the absence to the relevant Local Authority in writing
- report the absence to the child's parent or care-giver in writing

- emergency contact details are held securely on Tracker system

## **PRIVATE FOSTERING**

Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'. A connected person is defined as a 'relative, friend or other person connected with a child'. The latter is likely to include person(s) who have a pre-existing relationship with the child.

### **Haddon Training Ltd. understands that it has a mandatory duty to inform the local authority of children in such arrangements.**

The local authority will be notified by the DSL if a child is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks.

## **ON LINE SAFETY**

All Learners, at Induction, will have access to information about safe use of devices and how to stay safe online. This will be ongoing throughout their time on programme.

## **CRIMINAL EXPLOITATION OF CHILDREN (County Lines)**

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

County Lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults.

'County Lines' operates by gangs from urban areas, in particular London but also other cities, introducing a telephone number in a new area to sell drugs directly at street level. Potential buyers telephone the number and local runners are dispatched to make deliveries via a telephone 'relay or exchange' system. The 'runners' are almost invariably children, often boys aged 14 – 17 years, who are groomed with the promise of money and gifts and deployed or forced to carry out day to day dealing. Runaway and missing children are also used by gangs to expand inner city drugs operations into county towns. Children as young as 11 years of age have been reported as being recruited by these highly organised networks.

Gang members also enter into relationships with young, often vulnerable, women in order to secure a location for drugs to be stored in the new area. In addition, violence is used against drug users to coerce them to become runners, enforce debts, and use their accommodation as an operating base.

All staff at Haddon Training Ltd. Will be vigilant and report to the DSL any potential issues with learners.

## **SAFEGUARDING LEARNERS**

The Company has a responsibility to report to the proper authority, any abuse as described above, from which it is perceived a learner is suffering. All learners are given a Haddon Training Safeguarding Contacts Key Fob. This gives them the name, email address and telephone number of HT's Designated Safeguarding Lead.

All learners are taught about safeguarding, including on-line, through various teaching and learning opportunities which commences at Induction and continues throughout their programme of learning with Haddon. This is logged in progress reviews.

Employees of HT share the responsibility described above and do not have an option to keep 'secrets' with learners. If a learner asks to share with a HT employee an incidence of abuse, whether described above or not, and asks for it to be kept secret, the employee must advise the learner before they impart the information that they cannot keep it a secret. If the learner decided to go ahead and tell

the employee, they must then pass the information onto HT's Designated Safeguarding Lead or Deputy Safeguarding Officer. The DSL or DSO will contact the learner and then investigate. If necessary, they will advise the learners' employer (and/or suitable government agency) and take any necessary steps to protect the learner from that perceived abuse.

Children and young people with Special Educational Needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, abuse and injury relate to the child's disability without further exploration
- these children may be disproportionately impacted by bullying without outwardly showing any signs
- communication barriers may be more of an obstacle

### **Children with Special Educational Needs or Disabilities**

At HT we identify learners who might need more support to be kept safe or to keep themselves safe by:

- identifying SEN/ALN at Induction or at any time during their programme
- completing an ALN notification form
- undertaking additional ALN visits
- monthly discussion with Team leaders on all ALN learners
- identifying ALN learners on the weekly In-learning Report
- regular discussion and teaching on Safeguarding by Trainer Coaches to identify and provide appropriate strategies and support with employer communication

### **Peer on Peer Abuse**

This includes, but is not limited to, bullying, cyber-bullying, gender based violence, sexual assaults and 'sexting'.

In cases of 'sexting' we follow guidance by the UK Council for Child Internet Safety (UKCCIS) published in August 2016.

HT supports victims of peer on peer abuse by reporting to the Designated Safeguarding Lead for investigation and appropriate action.

### **ROLE OF DESIGNATED SAFEGUARDING LEAD/DEPUTY SAFEGUARDING OFFICER**

The DSL is responsible for safeguarding and child protection at Haddon Training by:

- managing referrals from staff or any others outside the company
- working with external agencies and professional on matters of safety and safeguarding
- undertaking training at least every two years and updates annually
- raising awareness of safeguarding and child protection amongst staff, learners, employers and parents

Haddon Training has a Designated Safeguarding Lead (Nicky McDonald) and a Deputy Safeguarding Officer (Lindsay Howlett).

## **REPORTING SAFEGUARDING, PREVENT AND CHILD PROTECTION CONCERNS**

When Haddon staff have a concern about a child or young person they should:

- notify the DSL (or DSO) by phone within 10 minutes where there is an immediate danger or risk of harm. If the member of staff is unable to contact the DSL or DSO within this time frame and where there is an immediate danger or risk of harm they should escalate the report immediately to the Managing Director (Chris Hewlett) or a member of the SMT and then complete the Safeguarding Report Form to the DSL within 4 hours  
*NB in the event of being unable to contact any senior management at Haddon Training the staff member should report directly to either the police or relevant local authority social services department, as appropriate.*
- For all other Safeguarding Concerns, notify the DSL/DSO by phone initially as soon as practically possible, ensuring they speak to the DSL/DSO and do not leave voice messages. Complete the Safeguarding Report Form (on google documents) and submit to the DSL within 24 hours.
- All verbal conversations should be promptly recorded in writing

At Haddon Training we recognise the possibility that adults working alongside learners may harm them. Any concerns about the conduct of other adults in the Traineeship/Apprenticeship location should be taken to the DSL/DSO without delay.

## **STAFF SAFEGUARDING TRAINING**

All Haddon staff will undertake the following Safeguarding training:

- Induction training on our Safeguarding Policy, Procedures, Personnel and Toolkit
- Annual training to provide them with relevant skills and knowledge to safeguard children effectively
- Regular safeguarding and child protection updates as required
- Learning resources / materials circulated for use with learners

DSL and DSO attend training every two years and in addition to formal training their knowledge and skills is refreshed at regular intervals at least annually.

## **WHISTLEBLOWING**

Where there are concerns about the way that safeguarding is carried out at Haddon Training staff should refer to the NSPCC Whistleblowing helpline on 0808 800 5000

## **RELEVANT DOCUMENTS ALL STAFF MUST READ**

- Keeping Children Safe in Education 2018 Part 1 and Annex A
- Haddon Staff Code of Conduct
- Haddon Safeguarding Policy
- Haddon Safeguarding Toolkit

# PREVENT - NOTICE CHECK SHARE

As part of The Counter-Terrorism and Security Act 2015, Haddon Training has a duty to 'PREVENT' people being drawn into terrorism. This has become known as the 'Prevent Duty'.

## 1. Aim

The aim of this part of policy is to outline our approach to supporting the national 'Prevent' Agenda linked to the safeguarding of our learners and staff. This policy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and

Security Act 2015. The Duty states that specified authorities including Training Providers, in the exercise of their functions, must have "due regard to the need to prevent people from being drawn into terrorism".

## 2. Objectives

- 2.1 To develop and reinforce awareness of 'Prevent' in Haddon Training Ltd.
- 2.2 To recognize current practice which contributes to the 'Prevent' agenda.
- 2.3 To outline the process of risk assessment in Haddon Training Ltd in order to identify areas for improvement in meeting the Prevent Duty.
- 2.4 To clearly identify the processes involved in making a 'Channel' referral.

## 3. Awareness of the Prevent Agenda

- 3.1 Prevent is 1 of the 4 elements of 'CONTEST', the government's counter-terrorism strategy. The 4 elements are: Pursue, Protect, Prepare and Prevent. It aims to stop people becoming terrorists or supporting terrorism.
- 3.2 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.
- 3.3 It provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- 3.4 It works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation.
- 3.5 The Prevent Duty incorporates the responsibility to promote Fundamental British Values through our practices and the formal and informal curriculum. These values are defined as; democracy, the rule of law, individual liberty and mutual respect and tolerance of those of different faiths and beliefs.
- 3.6 The Prevent Duty covers all forms of radicalisation, including risk from extremist faith groups, far right extremism and some aspects of non-violent extremism.

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

## 4. Current Haddon practice which contributes to Prevent

- 4.1 Haddon's Safeguarding, Child Protection and Prevent Policy features reference to the Prevent agenda to safeguard our apprentices, learners and members of staff.
- 4.2 The Designated Safeguarding Lead arranges regular training sessions on Prevent to maximize the opportunities for expert input to develop staff awareness.
- 4.3 Our work to promote Equality and Diversity within Haddon Training Ltd incorporates British Values, contributes to good community relations and reduces the risk of radicalisation.

4.4 All Haddon Trainer Coaches regularly include education on Prevent in their delivery of teaching and learning making a positive contribution to the development of a fair, just and civil society.

## 5. Prevent Risk Assessment

5.1 The Prevent Duty Guidance requires all relevant institutions to conduct a regularly reviewed Prevent Risk Assessment and associated Action Plan.

5.2 Haddon's Risk Assessment will be constructed and reviewed by the Chief Operating Officer drawing in commentary and responsibility for actions from other members of staff as appropriate.

5.3 The Risk Assessment and Action Plan will be additionally overseen by the Designated Safeguarding Lead and a summary will be reported annually to the Senior Management Team.

## 6. Channel Referrals

6.1 A Channel referral is a supportive activity which initially involves identification of any learner or member of staff at risk of radicalisation.

6.2 A referral should be made via a member of the Safeguarding Team, typically the Designated Safeguarding Lead.

6.3 Appendix 1 shows the referral flow chart.

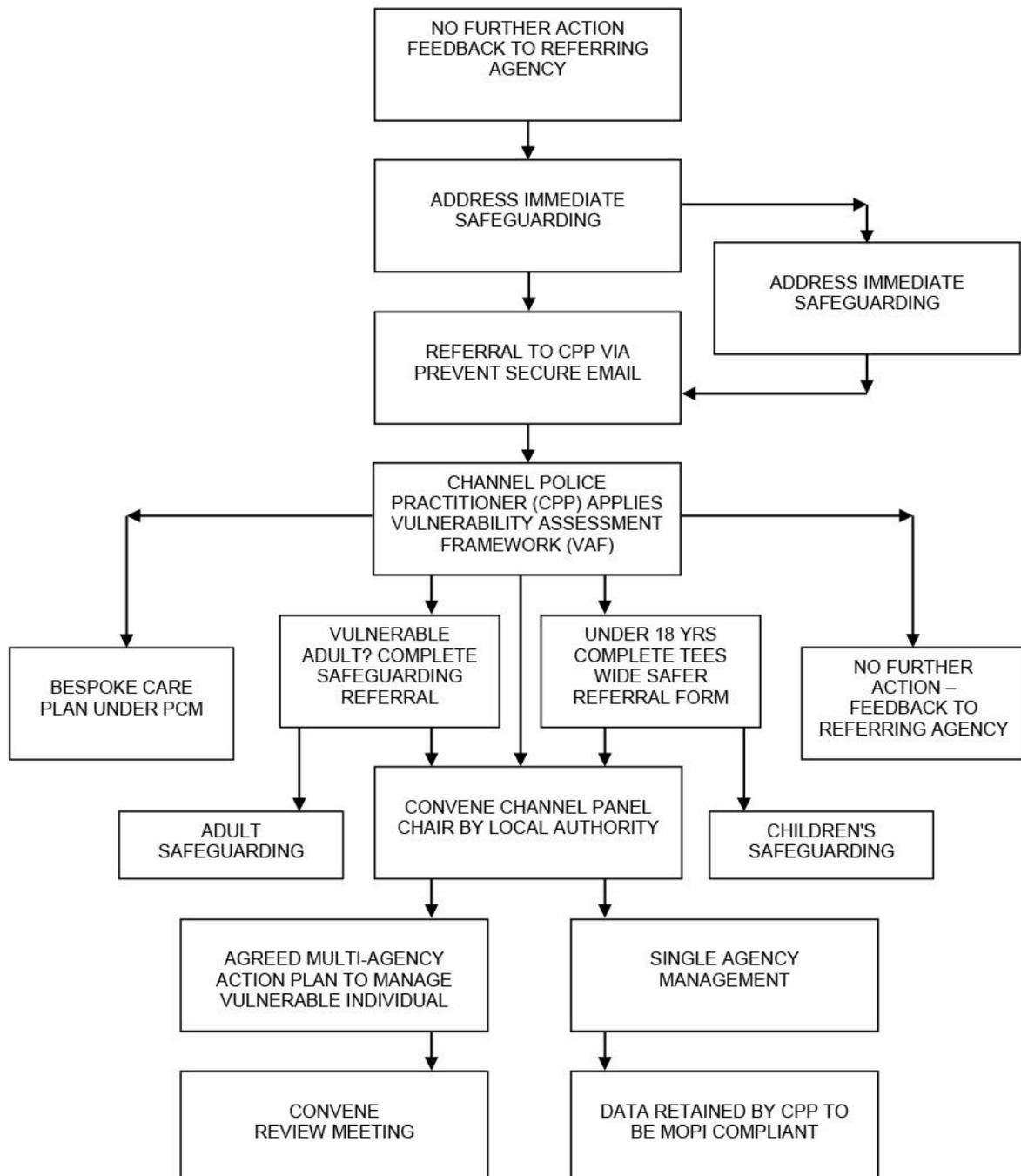
<b>Linked Policies:</b>	<ul style="list-style-type: none"><li>• Equal Opportunity</li><li>• Disciplinary Policy</li><li>• Staff Code of Conduct</li><li>• Disciplinary &amp; Dismissal Policy</li><li>• Health and Safety Policy</li><li>• Prevent Risk Assessment</li><li>• British Values</li></ul>
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### Appendices

1. Channel referrals
2. Safeguarding Report Form
3. Links to key documents
4. Contact telephone numbers

**Appendix 1 – ‘Channel’ Referrals (Example).**

**Please refer to your Designated Safeguarding Officer for local referral procedures.**



## SAFEGUARDING REPORT FORM - SG1

*This form should be used to record concerns about a young person. It should be completed as accurately as possible & passed directly to the Designated Safeguarding Lead who should action & then file securely. If emailed it must be password protected. The Company's child protection & safeguarding procedures should always be followed.*

### Learner Details

Name:	
ULN:	
DoB:	
Address:	
SEN Status:	

### Staff Details

Name:	
Date of incident:	
Location of Incident:	
Time of Incident:	
Time / date report disclosed:	

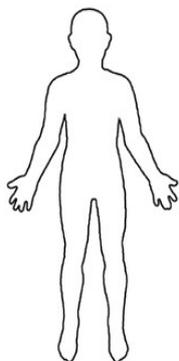
### Concern Details

Immediate Risk of Danger: Yes / No

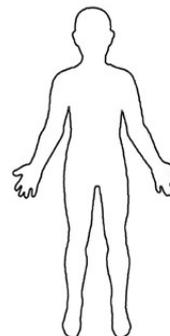
General Safeguarding concern: Yes / No

#### **NATURE OF CONCERN**

Provide details of the concerns or incident including times, dates and places. Descriptions of any injuries (use body diagram for location of injuries). Include witness details, observations, anything you have heard or been told. Is the information first hand, fact or opinion? Ensure you clearly record the voice of the child (use capitals so it can be easily recognised). Act in a timely manner. Clearly sign and date everything.



FRONT



BACK

**NATURE OF CONCERN continued**

Name:

Signature:

Date:

**INITIAL ACTIONS & ANTICIPATED OUTCOMES (TO BE COMPLETED BY DSL / DSO)**

Name (DSL):

Sign:

Date:

*This form should be used to record concerns about a young person. It should be completed as accurately as possible & passed directly to the Designated Safeguarding Lead who should action & then file securely. The Company's child protection & safeguarding procedures should always be followed.*

**Links to key documents:**

*KCSiE Part one and Annex A Update Sept 2018 - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/707688/Keeping\\_Children\\_Safe\\_in\\_Education\\_-\\_Part\\_1\\_-\\_September\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707688/Keeping_Children_Safe_in_Education_-_Part_1_-_September_2018.pdf)*

*Working Together to Safeguard Children (update July 2018) - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/722305/Working\\_Together\\_to\\_Safeguard\\_Children\\_-\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf)*

*Child Sexual Exploitation Update Feb 2017 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/722305/Working\\_Together\\_to\\_Safeguard\\_Children\\_-\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf)*

[a/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](#)

*Criminal Exploitation of Children (including County lines)*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/626770/6\\_3505\\_HO\\_Child\\_exploitation\\_FINAL\\_web\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626770/6_3505_HO_Child_exploitation_FINAL_web_2_.pdf)

Contact Numbers

Nicky McDonald      07795 841 932

Lindsay Howlett      07795 834 331

Chris Hewlett      07887 731 533

Social Services – Use this web address to find the department you need: [www.gov.uk/find-local-council](http://www.gov.uk/find-local-council)

Police – 101 (this number replaces all local station numbers)

Channel - Contact ***the relevant local authority*** Prevent Coordinator

**This policy has been approved & authorised by:**

**Name:** Chris Hewlett

**Position:** Managing Director

**Date:** December 2018

**Signature:**

