1. PURPOSE

Safeguarding is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.

Every member of staff at Decoded has a role to play in protecting our learners and staff from harm, abuse, exploitation and radicalisation. As such this policy is relevant and applicable to all staff including senior, middle management, permanent and temporary support staff and Safeguarding Officers (SO).

Contractors, volunteers and other people working for Decoded will also be required to operate within the ethos and parameters of the policy and its associated procedures.

2. OUR COMMITMENT

Our commitment is to support the implementation of policies and procedures enabling all learners to achieve their full potential in a safe, welcoming and happy learning environment, free from harm, abuse and exploitation.

Decoded is equally committed to supporting staff in creating an environment in which they can work together to develop an ethos for all our customers, including children and adults at risk, to feel secure, and one in which they have a clear structure within which to work and learn safely.

Our prime concern must always be the safety and interest of all, therefore, reasonable steps will be taken to prevent foreseeable harm to young people, adults and staff.

Decoded will ensure all staff, including temporary, part time and voluntary receives appropriate training in their legal and professional obligations to protect young people, adults and staff at risk from harm, abuse and exploitation.

The culture of vigilance extends to external relationships. For example, where employers with whom Decoded is engaged are in breach of the Equality Act or advocating extremist views or behaviour this will be addressed as a Safeguarding / Prevent issue by the Lead Safeguarding Officer.
3. SCOPE

Adhering to this policy is mandatory and safeguarding is the responsibility of all staff.

3.1 Role of the Lead Safeguarding Officer

For effective implementation of the Safeguarding & Prevent Policy, all staff must work in partnership to ensure the protection of those attending Decoded. However, the Lead Safeguarding Officer has a specific role in dealing with any safeguarding matters that arise.

The role of the Lead Safeguarding Officer is to:

- Write, update and maintain the policy and procedure
- Ensure that the policy and procedure maintain compliance with all statutory and legal obligations
- Support appropriate staff training
- Complete risk assessments
- Work in conjunction with external professionals and agencies
- Act as a point of contact and support for staff and learners
- Receive and advise on all incidents and concerns reported by staff
- Take a lead role in the implementation of policy, procedure and staff training
- Maintain up to date knowledge on Safeguarding and Prevent issues
- Maintain complete and accurate records and retain these confidentially

The Lead Safeguarding Officer is:

**Barbara Veeramallay-Permau, Director of Quality and Compliance**

barbara@decoded.com

3.2 Safeguarding Policy

This policy sets out the Decoded framework for protecting children, young people, vulnerable adults and staff from harm, abuse and exploitation. It details the action that will be taken within Decoded in response to concerns about children, young people, adults and staff at risk and to allegations of harm, abuse or exploitation.

Abuse can happen anywhere – including cyber bullying, social media websites, mobile telephones, text messages, photos and emails, in a person’s own home, in a residential or a supported living setting, a hospital or GP surgery, a prison, day centre or educational setting, library, sports centre, within the workplace, or within the community.

3.3 Definitions

These definitions have been taken from a range of legal and stator sources including legislation relating to the protection of children and adults and guidance from the UK government and associated agencies.

- **Safeguarding** – Is the process of protecting vulnerable people, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
Duty of Care – Our responsibility to use professional expertise and judgement to protect and promote the best interests of children, young people, adults and staff and to ensure that we exercise an appropriate level of care towards them, as is reasonable within the parameters of our relationship.

Child – Someone who is aged under 18 years, including apprentices aged 16-17 years old.

Child Protection – Child Protection is a part of the overall area of safeguarding and refers to the activities undertaken to protect specific children who are being harmed or are at risk of harm.

Adult at Risk – Someone who is aged 18 or over and who is or may need community care services by reason of mental or other disability, age or illness, who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Vulnerable Adult – Vulnerable Adult is the term that was previously used to refer to someone we would most often now refer to as an Adult at Risk.

Harm – Harm is most broadly defined as being all harmful conduct, but more specifically is conduct which causes physical, psychological or self-harm or unlawful conduct which appropriates or adversely affects property, rights or interests.

Abuse – All forms of physical and/or emotional ill treatment, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to health, survival, development, or dignity in the context of a relationship of responsibility, trust or power.

Trafficking – The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or the giving or receiving of payments or benefits to obtain the consent of a person having control over another person for the purpose of exploitation.

Exploitation – Includes the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or service, slavery or practices like slavery, servitude or the removal of organs.

3.4 Purpose

The purpose of this policy is to ensure that concerns about the welfare of children, adults and staff at risk are dealt with sensitively, effectively and promptly.

It is important that children, adults at risk and staff are protected from abuse. All complaints, allegations or suspicions must be taken seriously. This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that abuse has occurred.

Promises of confidentiality should not be given as this may conflict with the need to ensure the safety and welfare of the individual.

How do we report this?

- A full, factual record shall be made as soon as possible, disclosing of the nature of the allegation using the Safeguarding Concern Form or emailed to safeguarding@decoded.com.
- This should include information in relation to the date, time and place where the alleged abuse happened, your name and the names of others present, the name of the complainant and, where different, the name of the adult who has allegedly been abused, the nature of the alleged abuse, a description of any injuries observed, the account which has been given of the allegation.
3.5 Identifying Harm

Through day to day contact with clients and learners Decoded staff are well placed to observe outward symptoms of abnormality or change in appearance, behaviour, learning pattern or development. Such symptoms could be due to many factors however it could be due to harm.

Concerns regarding the protection of children and adults at risk may arise because:

- A child or adult discloses that they are being harmed
- There are suspicions or indicators that a child or adult is being harmed
- There are observable changes in the behaviour of a child or adult that could relate to harm
- The behaviour of a member of staff towards a child or adult causes concern or there is a suspicion that a member or volunteer is harming a child or adult

Although no list of symptoms can be exhaustive, possible signs of harm may include:

- Bruises and injuries with which the explanation given seems inconsistent
- Possible indicators of neglect, such as inadequate clothing, poor growth, hunger, poor hygiene
- Possible indicators of emotional harm, such as excessive dependence, attention seeking, self-harm
- Possible indicators of sexual harm, such as signs of bruises, scratches, bite mark, or behavioural signs such as precocity, withdrawal or inappropriate sexual behaviour
- Agitated or anxious behaviour
- Nervousness
- Inappropriate or improper dress
- Appearing unwashed
- Being overly anxious to please
- Signs of discomfort or pain
- Frequent absences
- Uncharacteristic changes
- Reluctant to go home

It is not the responsibility of staff working for Decoded to decide that someone is being harmed or to investigate concerns or allegations, but it is a responsibility of every member of staff to share them with the Lead Safeguarding Officer.

4.0 Prevent

The threat to the UK from both UK and international terrorism is substantial. The terrorist threats that we now face are more diverse than ever before, dispersed across a wider geographical area and often in countries without effective governance. We therefore face an unpredictable situation.

Dealing with violent extremism is nothing new. Throughout history there have been groups prepared to use violence to achieve their aims. A small minority of these seek to radicalise young people with an ideology which justifies the use of violence through a distorted interpretation of a set of values, often associated with a religion.

In line with guidance from the Department for Education (DfE), Decoded has a zero tolerance acceptance of extremist behaviour and ensures that our care, guidance and curriculum to empower people to reject violent or extremist behaviour.
Whilst it remains very rare for learners to become involved in extremist activity, any learner can be exposed to extremist influences or prejudice views, including via the internet.

**4.1 Definitions**

Extremism in this context is defined as:
“vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.”

For the purposes of this policy, any references to **adults at risk** should also be deemed to refer to individuals who have reported extremism or who have been the subject or target of extremism.

**4.2 Strategies for Preventing Extremism**

The office for security and counter terrorism works to counter the threat from terrorism and their work is detailed in the counter terrorism strategy CONTEST. This strategy is based on four areas of work:

- **Pursue** – to stop the terrorist attacks
- **Prevent** – to stop the people becoming terrorists or supporting terrorism
- **Protect** – to strengthen our protection against terrorist attacks
- **Prepare** – to mitigate the impact of a terrorist attack

Decoded follow principles which seek to:

- Raise awareness to all learners of the threat from violent extremist groups and the risks.
- Provide information about what can cause violent extremism, about preventative actions taking place locally and nationally and where we can get additional information and advice.
- Help learners to understand the positive contribution they can make to empower themselves to create communities that are more resilient to extremism and protecting the wellbeing of learners or groups who may be vulnerable to being drawn into violent extremist activity.
- Provide advice on managing risks and responding to incidents locally, nationally or internationally that might have an impact on the learning environment.

Decoded will use these principles to guide our work in all areas including building on our work in:

- Promoting every learner matters, outcomes for each learner
- Promoting learner wellbeing, equalities and community cohesion
- Building the resilience of Simply Academy working with partners to prevent the learners coming victims of harm
- Working with other agencies and parents to support the wellbeing and welfare of our learners

**4.3 Possible signs of radicalisation**

According to the anti-terrorism prevent toolkit, potential signs of radicalisation include:

- The individual’s views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
● The individual becomes increasingly intolerant of more moderate views
● 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.
● The individual expresses a desire/intent to take part in or support extremist activity

As part of Decoded's objectives to safeguarding, equality, inclusion and the promotion of British Values, we will ensure that all staff have the confidence to recognise the signs that learners or colleagues are at risk of radicalisation. We do this by:

● Promoting fundamental British Values and by ensuring that there is a culture of openness within all delivery and teams
● Challenging segregation, promoting cohesion and building learner resilience with the aim of our learners and staff contributing actively to wider society
● Operating a clear and consistent anti-bullying approach which challenges harassment and discriminating and enables learners and staff to feel safe and supported
● Providing support, advice and guidance for learners and staff who may be at risk. This may include referral to channel, the process by which multi agency support is provided to individuals who are at risk of being drawn into terrorism
● Ensuring that staff, learners and employers are aware of their roles and responsibilities in preventing radicalisation and extremism
● Having a leadership team which actively promotes the core values of shared responsibilities and well-being for learners and staff and ensures and these are at the centre of everything that we do

4.4 Accountabilities and Responsibilities

All staff should be vigilant to extremist’s behaviour as a wider part of their safeguarding duties and report their concerns to the Lead Safeguarding Officer

4.5 Managing and Responding to Risk

Decoded will carry out an annual risk assessment using a Prevent Risk Assessment. This helps to evaluate where and how customers or staff may be at risk of being drawn into terrorism. This will include reviewing policies regarding the delivery of learning, learner and staff welfare, equality and diversity, and the safety and welfare of customers and partners.

We will ensure that there is a shared understanding amongst staff and learners as to the risks posed within the training environment by extremist’s behaviour by raising awareness through training and information sharing. Steps will be taken to mitigate the risk posed to staff/learners by individuals vulnerable to extremism on a case by case basis.

Referrals to the Channel programme will be made on a case and with consideration being made to the need for a multi-agency approach in advance of any referrals.

Further risk assessments will be carried out any time Decoded premises are used for events held by staff, customers or visitors, external bodies, community groups or partners. Risk assessments will be undertaken on any external speakers and clear guidance will be issued as to levels of acceptable behaviour whilst on site.

All resources and materials, including, externally produced leaflets, posters and communications will promote fundamental British Values and have due consideration to the Equality Act.
Decoded will only promote its service within organisations that share its values for the need to safeguard, promote equality and prevent extremist behaviour. Where required risk assessments will be undertaken to consider the appropriateness of venues before agreements are made to provide information and advice to individuals whining that organisation.

4.6 Teaching and Learning

A curriculum that promotes Fundamental British Values with a view to encourage learners to participate in their local communities and use their voice to make positive changes will be provided.

Fundamental British Values involve people showing tolerance and respect for the rights of others. It also enables customers to distinguish the difference between right and wrong, to also encourage them to respect the civil and criminal law of England. Tolerance and harmony is promoted between different cultures, this is done so that customers show appreciation and respect for others and their own cultures.

We will take every available opportunity to match curriculums to local priorities whilst offering learners the opportunity to develop critical thinking skills. Using topical and relevant examples to stimulate thinking we will actively tackle discrimination.

4.7 Use of Monitoring of IT

IT equipment provided to both staff and learners is subject to monitoring of its use. In addition to monitoring, filters are applied to restrict access to harmful content and prevent people from being drawn into extremist behaviour. Inappropriate use of IT facilities that appears to be in breach of the Prevent policy must be reported to the Lead Safeguarding Officer.

4.8 Reporting an Allegation

Any suspicion, allegation or incident relating to Safeguarding or Prevent must be reported to the Lead Safeguarding Officer within 24 hours.

All reports must be reported to the Lead Safeguarding Officer.

If the Line Manager and Safeguarding Officers are not available, reports must be reported to other Senior Managers. The purpose of reporting to management is to raise awareness and to ensure that staff members are dealing with the allegation appropriately and in line with company procedures.

4.9 Responding to an Allegation

When responding to an allegation DO:

- Make sure the individual is safe
- Assess whether emergency services are required and if needed call them
- Listen
- Offer support and reassurance
- Ascertain and establish the basic facts
- Make careful notes and obtain agreement on them. Ensure notation of dates, time and persons present are correct and agreed
- Follow correct procedure
- Explain areas of confidentiality; immediately speak to your Line Manager for support and guidance
● Take all necessary precautions to preserve forensic evidence, if applicable
● Explain the procedure to the individual making the allegation
● Remember the need for ongoing support.

Do NOT:

● Confront the alleged abuser or extremist individual
● Be judgmental or voice your own opinion
● Be dismissive of the concern
● Investigate or interview beyond that which is necessary to establish the basic facts
● Disturb or destroy possible forensic evidence
● Consult with persons not directly involved with the situation
● Ask leading questions
● Assume information
● Make promises
● Ignore the allegation
● Elaborate in your notes
● Panic

It is important to remember that the person who first encounters a case of alleged abuse or extremism is not responsible for deciding whether abuse or extremism has occurred. This is a task for the professional adult protection agencies or Prevent channel panels, following a referral from the Lead Safeguarding Officer.

5.0 Allegations against Staff

Where an allegation concerns the actions of a member of staff (who may also be colleague) it is the clear duty of all those concerned to report the matter as set out above.

Decoded sets out clear reporting procedures for unethical or improper conduct. When it comes to raising Safeguarding or Prevent concerns, no distinction should be made between staff and other persons. The wellbeing of children, adults at risk, staff and other customers is paramount.

It is important to ensure that the action taken:

● Protects the rights and wishes of the child or adult at risk
● Protects the rights of the member of staff concerned
● Enables managers to take appropriate action either on behalf of the child / adult at risk or against the staff member where appropriate; and
● Does not compromise any criminal investigation.

Any member of staff who is alleged to have had an inappropriate relationship with a vulnerable learner will be suspended whilst an investigation is carried out. On completion of investigation written records for any member of staff who is found to be innocent must be destroyed immediately.

5.1 Reporting Safeguarding & Prevent

● It is important that any issues relating to Safeguarding or Prevent are reported promptly, accurately and as comprehensively as possible.
● Data protection guidelines should be observed when recording sensitive information. All recorded information should be handled sensitively, and all conventions of confidentiality must always be adhered to.
6.0 Safeguarding Concern Form

If a child or adult discloses to you that they are being harmed, you must complete the **Safeguarding Concern form within 24 hours**. The form should be completed as fully and as much in the words of the person and will be issued by the Lead Safeguarding Officer or accessed on Wiki.

If you believe there may be issues in respect of Safeguarding or Prevent but do not have direct witness testimony or explicit disclosure, again use the Safeguarding Concern Form, examples of when to use this include:

- if you have a concern that a child or adult may be harmed
- if you have a concern that a member of staff or an adult is behaving inappropriately
- if you have a concern that a customer or employee may be at risk of extremism

Similarly, if you, a customer or other employee directly experiences or witness extremism, the procedure above should be followed. This recording can be done in conjunction with the Designated Safeguarding Officer if required.

7.0 Referring Information within Decoded and to External Agencies

Information should be referred to the Lead Safeguarding Officer. No information should be referred to an external agency by any staff member other than the Lead Safeguarding Officer or to the Director of Quality & Compliance in exceptional circumstances of escalation bypassing the Lead Safeguarding Officer.

On receiving information relating to a concern about a child or adult the Lead Safeguarding Officer will undertake consultation in order to be able to decide as to appropriate action.

Three decisions may be made:

- **No further action required** – concerns have been allayed but written documentation regarding the concern and the reasons for no further action being taken will be kept.
- **Continued monitoring of the situation** – concerns have not been fully allayed, however, continued monitoring of the situation is required. Involved parties will continue to listen, observe, record, consult and report.
- **Formal referral** – referral will be made to the most relevant agency by the Designated Safeguarding Officer.

If the decision is formal referral, the Lead Safeguarding Officer shall telephone and report the matter to the appropriate local Safeguarding Officer or Regional Prevent Coordinator, as appropriate. They may also engage with other appropriate external agencies, as set out below.

A written factual record of the date and time of the report shall be recorded on the Safeguarding Concern form, including the name and position of the person to whom the matter is reported. The report must be confirmed in writing to the relevant referral body within 24 hours.

https://www.safeguardingadultsyrk.org.uk/what-is-safeguarding/how-to-raise-a-safeguarding-concern/
7.1 Confidentiality

Vulnerable adult protection raises issues of confidentiality which should be clearly understood by all. Similarly, reports of extremism also raise significant issues of confidentiality. The following guidelines apply to safeguarding issues in respect of children, adults at risk, and Prevent.

- Staff and associates have a professional responsibility to share relevant information about the protection of vulnerable adults with other professionals, particularly investigative agencies and adult social services.
- Clear boundaries of confidentiality will be communicated to all.
- All personal information regarding a vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines.
- Records will only record details required in the initial contact form.
- If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate agencies.
- Within that context, the adult should, however, be assured that the matter will be disclosed only to people who need to know about it.
- Where possible, consent should be obtained from the adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the vulnerable adult is the priority.
- Where a disclosure has been made, staff should let the adult know the position regarding their role and what action they will have to take as a result.
- Staff should assure the adult that they will keep them informed of any action to be taken and why. The adults’ involvement in the process of sharing information should be fully considered and their wishes and feelings considered.

7.2 Keeping Children and Adults at Risk Informed and Involved

The views of the child or adult at risk should be considered throughout the process of dealing with a safeguarding matter. The Lead Safeguarding Officer will keep the person informed while the matter is within the jurisdiction of Decoded and will provide support as required. Clients, learners, and staff will be provided with information on child and adult protection procedures.

8.0 The Role of Key Individual Agencies

Department of Health
The Department of Health’s recent ‘No Secrets’ guidance document requires that authorities develop a local framework within which all responsible agencies work together to ensure a coherent policy for the protection of vulnerable adults at risk of abuse.

Local Authorities
All local authorities have a Safeguarding Adults Board, which oversees multi-agency work aimed at protecting and safeguarding vulnerable adults. It is normal practice for the board to comprise of people from partner organisations who can influence decision making and resource allocation within their organisation.

If an allegation of abuse is made, the Lead Safeguarding Officer should make a referral to one of the local authorities.
The Police
The Police play a vital role in Safeguarding Adults with cases involving alleged criminal acts. It becomes the responsibility of the police to investigate allegations of crime by preserving and gathering evidence. Where a crime is identified, the police will be the lead agency and they will direct investigations in line with legal and other procedural protocols.

Prevent Coordinator & Channel referrals
Decoded will actively engage with other partners including police and BIS regional higher and further education Prevent coordinators, Guidance and local support can be found below:

https://www.counterterrorism.police.uk/

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour.

If the Lead Safeguarding Officer determines that a referral to the Channel panel is appropriate, they will contact the regional Prevent Coordinator.
Details of the regional Prevent Coordinators can be found at:

The Role of Management
The role of the Management is to support the member of staff or associates involved with the incident and to ensure the correct procedures are followed. Management may, if agreed with the staff member dealing with the incident, contact the Lead Safeguarding Officer in the first instance.
The Manager should ensure that all staff within their team are familiar with Safeguarding Procedures and ensure that all staff undertake training, where appropriate.

Learner and Staff Support
We will seek to actively safeguard all learners and provide welfare support at the point of need for all learners.
Anti-bullying strategies will be put in place to challenge discriminatory behaviour and response will be made to identify community needs.
We will actively narrow the achievement gap between different groups of learners.
A culture of vigilance is key, and we will operate a whistle blowing procedure which includes a reference to the Prevent agenda.

Training and Awareness of the Policy and Procedure
All staff are required to review this policy on an annual basis. Training will be provided, as appropriate, to reinforce staff awareness of these procedures. Mandatory Prevent training will equip staff with the ability to recognise signs that a learner or colleague might be on the path to becoming radicalised and outline the process by which concerns should be raised.
Specialist training will be provided for the members of staff with Safeguarding and Prevent responsibilities. This will include:

- Understanding the factors that make people vulnerable to being drawn into terrorism
Recognising this vulnerability in individual customers or staff
How to challenge extremist ideas which are used by terrorist groups and report to legitimise terrorist activity
What action to take, including when to make referrals to the Channel programme and where to get additional advice and support.
Decoded will actively promote our Safeguarding and Prevent duties to staff and learners alike. Customers are provided with access and ongoing awareness of the policy.

Related Policies
This policy needs to be read in conjunction with other policies including:

- Whistleblowing Policy
- GDPR Policy
- Health and Safety Policy
- Equality Policy
- E Safety
- Staff CPD Policy
- Safeguarding Concern Form
- Safeguarding Report

All policies can be accessed here: https://sites.google.com/decoded.com/new-wiki/policies

DOCUMENT CONTROL

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