

SAFEGUARDING & PREVENT POLICY

<i>Document Authorisation</i>	<i>Job Role</i>
Document Owner	Q&C Director
Authorised By	Senior Leadership Team

1. PURPOSE

Safeguarding is the process of promoting and protecting the safety and welfare of children, young people and vulnerable adults, however, Decoded are committed to safeguarding all apprentices and staff deemed to be at risk, regardless of their age and vulnerability.

Every member of staff at Decoded has a role to play in protecting our apprentices 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, governors and other people working for Decoded will also be required to operate within the ethos and parameters of the policy and its associated procedures.

We adhere to the following statutory frameworks:

- **Working together to safeguard children 2018**- guides us on inter-agency working to safeguard children and promote welfare and applies to all organisations and agencies that work with, carry out work related to, Children in the United Kingdom. A child in the UK is defined as anyone who has not yet reached their 18th birthday. Decoded will have apprentices that fall within the category.
- **Care Act 2014**- sets out the legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. These duties include leading a multi-agency local adult safeguarding system, making enquiries or requesting others to make them, establish Safeguarding Adults boards, carry out safeguarding reviews and arrange for independent advocates.
- **Keeping Children Safe in Education 2021**- sets out the guidance of keeping children safe in educational settings which includes everybody under the age of 18 years.
- **Education and Training (Welfare of Children) Act 2021**-A bill to impose duties on certain education and training providers in relation to safeguarding and promoting the welfare of children.

2. OUR COMMITMENT

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

Suze Mckechnie, Learner Support Manager

suze.mckechnie@decoded.com

3.2 Safeguarding Policy

This policy sets out the Decoded framework for protecting children, young people, vulnerable adults, apprentices and staff from harm, abuse, harassment 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, harassment or exploitation.

Abuse can happen anywhere – including cyberbullying, social media websites, mobile telephones, text messages, photos and emails, sexual harassment, 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 statutory sources including legislation relating to the protection of children and adults and guidance from the UK government and associated agencies.

- **Safeguarding** – This is the process of protecting vulnerable people from harm, whether from crime, other forms of abuse or from being drawn into terrorism-related activity.
- **Duty of Care** – Our responsibility is 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 that 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, sexual harassment 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 Types of abuse

signs of abuse can be difficult to detect and vary and many forms of abuse are criminal offences and should be treated as such. For safeguarding adults the ten types of abuse are:

- Physical abuse
- Domestic Violence or abuse
- Sexual abuse

- Psychological or emotional abuse
- Financial or material abuse
- Modern Slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of mission
- Self-neglect
- Online abuse, including 'internet of things'

Safeguarding children in education guidance states we need to be aware of the following types of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Disguised compliance
- Peer on peer abuse (child on child)

The NSPCC outlines other types of Child Abuse that are prevalent in modern society:

- Bullying and Cyberbullying
- Child sexual exploitation
- Child Trafficking
- Criminal exploitation and gangs
- Domestic abuse
- Female genital mutilation
- Grooming
- Online abuse

3.5 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 and staff at risk 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, describing the nature of the allegation using the [Safeguarding Concern Form](#) or emailed to safeguarding@decoded.com the same working day.
- 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 or child 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. For full process please see 7.0

3.6 Identifying Harm

Through day to day contact with clients and apprentices 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 marks, or behavioural signs such as precocity, withdrawal or inappropriate sexual behaviour
- Agitated or anxious behaviour
- Nervousness
- Inappropriate or improper dress
- Appearing unwashed
- Being over 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 the responsibility of every member of staff to share them with the Lead Safeguarding Officer.

3.7 Working with under 18s

Decoded work with apprentices who are under 18 years or early careers, we are committed to ensuring robust safeguarding and support. We adhere to working together to Safeguard Children (2018), Keeping Children Safe in Education (2021) and the Education and Training Welfare Act (2021). apprentices under the age of 18 years or early career are offered extended support during the apprenticeship journey to ensure they are safe from safeguarding, sexual harassment, peer on peer abuse and PREVENT. We shall offer peer group supervision, additional training around safeguarding and PREVENT, and offer individualised support.

3.8 Vulnerability risks during/post COVID-19 pandemic

Risk factors have presented during the COVID-19 pandemic that could put our apprentices at greater risk of becoming vulnerable, Decoded take this seriously and where appropriate, work with apprentices to signpost to preventative advice and support. All staff are trained in awareness of these risk factors and are encouraged to seek advice and support where an apprentice may be facing such issues and provide wellbeing resources that might prevent safeguarding needs-

These risk factors include:

- Redundancy
- Furlough
- Additional workload/turnover/change in line manager
- Caring responsibilities
- Health conditions
- Long COVID
- Financial difficulties
- Relationship breakdown
- Isolation and loneliness
- Mental Health
- Muscular skeletal problems
- Homeworking/virtual burn out
- Bereavement and loss
- Domestic abuse and violence including adolescent to parent
- Control or abuse using 'Internet of things'
- Moving home
- Change in domestic set up

3.9 Financial pressures due to the cost of living increase

Risk factors relating to the increased cost of living could put our apprentices at greater risk of financial strain and/or result in wellbeing or potential safeguard risks. Combined with potential vulnerabilities during the Covid-19 pandemic, these risks are potentially higher than during the previous recession. Decoded takes this seriously and will work, where appropriate and necessary, to support and signpost apprentices to suitable and relevant professionals. Learners at risk due to financial pressures or concerns will be referred to the safeguarding team for initial support.

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 that 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 apprentices to become involved in extremist activity, any apprentice can be exposed to extremist influences or prejudiced 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 of 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 from 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 apprentices 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 apprentices understand the positive contribution they can make to empower themselves to create communities that are more resilient to extremism and protect the wellbeing of apprentices 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 apprentice matters, outcomes for each apprentice
- Promoting apprentice wellbeing, equality and community cohesion
- Building the resilience of Simply Academy working with partners to prevent the apprentices becoming victims of harm
- Working with other agencies and parents to support the wellbeing and welfare of our apprentices

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 apprentices 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 apprentice resilience with the aim of our apprentices and staff contributing actively to wider society
- Operating a clear and consistent anti-bullying approach which challenges harassment and discriminating and enables apprentices and staff to feel safe and supported
- Providing support, advice and guidance for apprentices 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, apprentices 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 apprentices 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, Suze.mckechnie@decoded.com

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, apprentice 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 apprentices as to the risks posed within the training environment by extremist behaviour by raising awareness through training and information sharing. Steps will be taken to mitigate the risk posed to staff/apprentices by individuals vulnerable to extremism on a case by case basis.

Referrals to the Channel programme will be made on a case by case basis 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, or external speakers join via remote sessions, 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 within Decoded.

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 within that organisation.

4.6 Teaching and Learning

A curriculum that promotes Fundamental British Values with a view to encouraging apprentices to participate in their local communities and use their voices 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 apprentices the opportunity to develop critical thinking skills. Using topical and relevant examples to stimulate thinking we will actively tackle discrimination.

4.7 Reporting an Allegation

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

All reports must be reported to the Lead Safeguarding Officer within 24 hours.

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.

4.8 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.

4.9 Allegations against Staff

Where an allegation concerns the actions of a member of staff (who may also be a 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 well-being 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 apprentice will be suspended whilst an investigation is carried out. On completion of the investigation written records for any member of staff who is found to be innocent must be destroyed immediately.

5.0 Reporting Safeguarding & Prevent

- It is important that any issues relating to Safeguarding or Prevent are reported promptly, accurately and as comprehensively as possible.
- GDPR 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.
- All investigations relating to a potential CHANNEL referral will be escalated to the designated safeguard lead where an investigation will take place and an overall decision, and referral if deemed necessary, will be made.

6.0 Safeguarding Concern Log

If a child or adult discloses to you that they are being harmed, you must complete the **Safeguarding Concern Log** the same working day. 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 is 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 after a timely investigation and understanding of the necessary next steps.

If the decision is a 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.safeguardingadultsyork.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, apprentices 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. Regional key contacts are listed within Annex B

<https://www.londonscb.gov.uk/london-scb-contacts/>

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.

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

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:

www.safecampuscommunities.ac.uk).

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

<https://www.bexley.gov.uk/services/community-safety-and-antisocial-behaviour/channel-panel-safeguarding-people-vulnerable-radicalisation>

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:

<http://www.safecampuscommunities.ac.uk/>

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.

apprentice and Staff Support

We will seek to actively safeguard all apprentices and provide welfare support at the point of need for all apprentices.

Anti-bullying strategies will be put in place to challenge discriminatory behaviour and a response will be made to identify community needs.

We will actively narrow the achievement gap between different groups of apprentices.

A culture of vigilance is key, and we will operate a whistle blowing procedure that 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 an apprentice 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 apprentices 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
- Bullying and Harassment policy

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

Annex A

Types of Abuse-Adults

Physical Abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

Domestic Violence and Abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- Coercive control
- Psychological and/or emotional
- Physical or sexual abuse
- Financial or economic abuse
- Harassment and stalking
- Online or digital abuse ('Internet of Things')

Types of Sexual Abuse

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Types of emotional and psychological abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends

- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyberbullying

Types of material or financial abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Types of modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

Types of discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Types of organisational and institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Types of neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Types of self-neglect

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Types of abuse-children

Types of Physical Abuse

- Hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Physical harm caused by a parent or carer fabricating the symptoms of, or inducing, illness

Types of Sexual Abuse

- Forcing or enticing a child or young person to take part in sexual activities, which may or may not involve violence
- Penetrative acts
- Non-penetrative acts (kissing, masturbation, rubbing or inappropriate touching)
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Non-contact (looking at or producing pornography or sexual images, watching sexual activities, grooming in preparation for abuse)

Types of Psychological and Emotional Abuse

- Overprotection – preventing someone accessing educational and social opportunities and seeing friends
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Conveying feeling of worthlessness, inadequacy or that a child is unloved
- Threats of harm or abandonment
- Placing inappropriate expectations on children
- Witnessing or hearing the abuse or ill-treatment of others (including domestic violence)

Types of Neglect

Neglect is found to be a factor in 60 percent of child deaths that are investigated through Serious Case Reviews. However, even though it is often suspected by those who work with children, it is under-reported. Neglect is a persistent failure to meet basic needs (physical or emotional) and it leads to serious harm to the health or development of a child.

- Failing to provide adequate shelter, clothing or food
- Failing to protect a child from harm or danger
- Failing to ensure that a child is supervised appropriately
- Failing to access medical care or treatment for a child when it is needed

Reference- Social Care Institute of Excellence

Child Exploitation

Definition taken from the Home Office

Child sexual exploitation is not defined in law. 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 in exchange for something the victim needs or wants, and/or 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.

Types of Peer on Peer Abuse

Peer on peer abuse relates to abuse between children. It has been highlighted that abuse between children has been 'normalised' and children are unlikely to report this, it is, therefore, essential that all staff are aware of the signs and be vigilant.

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing for sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could involve activities such as harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

Reference - Keeping children safe in education 2021

Annex B

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Draft	BVP	Pending Approval	Build
1.0	BVP	14th January 2020	None
1.1	CFM	20th January 2020	Remove email for web
1.2	BVP	15th February 2021	Review
1.3	CFM	26th February 2021	Update Lead Safeguarding officer
1.4	SMc/BVP	30th October 2021	Full Review
1.5	SMc	30 March 2022	Full Review