

 <p><b>FNTC</b> TRAINING</p> <p><i>Inspiring learning to achieve success</i></p>	<p><b>Policy Number: PP-DTLAQ- 15</b></p> <p><b>Version: 1</b></p> <p><b>Issue Date: June 2015</b></p> <p><b>Review Date: June 2016</b></p>
<p><b>Policy title: Safeguarding policy and procedure</b></p>	
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<p><b>Policy Owner:</b></p>	<p>Jacqueline Doherty</p>
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<p><b>Approved by: SLT</b></p>	<p><b>Date: June 2015</b></p>
<p>If you need help reading this document, or require it in a different format, please call 01794 523857</p> <p>Chief Executive Officer: Elizabeth Young</p>	
 <p>INVESTOR IN PEOPLE</p>	 <p>matrix® quality standard for information advice and guidance services approved by the matrix Accreditation Body</p>

## **1. Introduction**

This policy aims to detail the framework for promoting and ensuring the safeguarding and protection of all who learn, work and visit FNTC Training and Consultancy Ltd. This policy and procedures replaces version 1.1b Dated Jan 15.

Safeguarding in this context means recognising that the needs, well-being and safety of all people are considered at all times, and that actions relating to this are in line with legislative requirements and government recommendations.

## **2. Policy Statement**

FNTC is committed to Safeguarding and promoting the welfare of young people and vulnerable adults and expects all staff, volunteers and partners to endorse and practice this commitment at all times.

Staff at FNTC regard each learner as a unique individual and therefore seek to support learner development in ways which will foster security, confidence and independence. We recognise that high self-esteem, peer support, a safe and secure learning environment and clear lines of communication with trusted adults helps all young people and adults. These are regarded as central to the wellbeing of the individual and are therefore seen to be an intrinsic part of all aspects of the curriculum and ethos of FNTC.

## **3. Objectives**

- To safeguard all learners, (particularly children, young people and vulnerable adults and adults with identified needs).
- To safeguard FNTC staff, volunteers and partners in carrying out their duties in teaching, supervising and supporting learners at all FNTC centres, other external facilities, in the workplace or by distance learning.

## **4. Scope**

Applies to:

- All learners, particularly children, young people and adults who may need support
- All staff, volunteers and partners working at all FNTC centres, other external facilities, in the workplace or by distance learning.
- All learners, staff and other users of Centre, and all centre activities

The commitment to safeguarding extends collectively to everyone in the centre and all that we do. It is implicit that we will develop policies, procedures and systems which deal with such matters and which will promote respect and safety for individuals and good relations between people across all areas of the Centre; with particular reference to:

- Learners' personal development and tutorial care
- Opportunities for enrichment activities
- Access to further individual support for learners
- Partnerships with parents, communities, employers and other agencies
- Staff recruitment
- Professional development and access for further safeguarding training
- Employer and learner safeguarding packs are distributed at initial assessment

The Centre will take appropriate opportunities in these areas of its work to publicise and make explicit its commitment to the principle and practice of safeguarding. Procedures and practices in these areas will also take a lead from and will comply with the principles and framework this policy sets out.

It is also the responsibility of individual members of the Centre community to adopt the aims and values of this policy; to ensure learner safety remains paramount importance.

## **5. Definitions**

- Young people are defined as under the age of 18 years

## **6. Policy**

All staff are committed to ensuring safeguarding and promoting the welfare of all learners by:

**Prevention-** providing a safe environment for young people and adults with additional needs to learn in, e.g. through robust staff recruitment, policies and procedures that support safeguarding, a positive centre atmosphere which promotes our centre values and provides excellent pastoral and welfare support for all learners.

**Protection-** identifying any young people and adults with additional needs who are suffering, or likely to suffer, significant harm, e.g. by neglect, physical injury, sexual abuse or emotional abuse or any aspect of bullying, harassment or coercion.

**Support-** taking appropriate action to see that all young people and adults with additional needs are kept safe, both at work and at the Centre.

In pursuit of these aims the Centre Management will ensure safeguarding is a high priority and approve and annually review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of young people and adults with additional needs and ensuring the promotion of a safe environment for all learners within the centre, work placements and related environments. This will be achieved by regularly promoting and embedding safeguarding and health and safety key measures into our teaching, learning and student support.
- Following appropriate procedures to ensure staff are trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns. This will be

achieved by close monitoring of staff continuous performance development (CPD) training records and following up any none attendance

- Identifying young people and adults who have additional needs and/or at risk of significant harm and providing procedures for reporting concerns. This will be achieved by linking with all centre staff where disclosures may be discussed. Additionally, the use of the safeguarding log is used to centrally record concerns and monitor actions put in place
- Establishing clear procedures for reporting and dealing with allegations of abuse against members of staff and or learners. This will include seeking timely advice from external safeguarding agencies when learners are potentially at risk of any harm ( see appendix 6 for flow chart)
- The safe recruitment and employment of staff. This will be achieved by the Human Resource Team and all staff involved in the recruitment process following legislation, policy and procedures
- Providing suitable systems to ensure the safety of visitors and all who visit a FNTC Centre. This will be achieved by joint work with the health and safety lead and ensuring all risks are adequately controlled and regularly reviewed, as necessary.
- Providing environments where everyone feels valued, safe and respected where individuals are encouraged to talk and are listened to and valued. This will be achieved by the regular promotion of the Centre values and embedding these across every area of the centre activity

In developing and reviewing these safeguarding policies and procedures the centre management undertake consultation with staff, learners and the relevant bodies including the Local safeguarding children board, the department for children, schools and families and the disclosure and Barring service and follow recommended guidance.

The SLT receives an annual report on safeguarding from the staff member with lead responsibility (see chart in section B) which reviews how the duties have been discharged. Safeguarding is regularly reviewed and Action plans record the progress of specific points

Types and possible signs of child abuse are provided in **Appendix 1**. Examples of harm to are provided in **Appendix 2**. Additionally, the centre acknowledges “abuse of position of trust”, which prohibits staff from engaging in or encouraging sexual activity with learners who are under the age of 18 or vulnerable.

Safeguarding children and safer recruitment in Education DCFS (2007)  
Hampshire safeguarding children’s board safeguarding children procedures  
Dorset safeguarding children’s board safeguarding children procedures

What to do if you are worried a child is being abused  
<http://www.hampshiresafeguardingchildrenboard.org.uk/>

<https://www.dorsetlscb.co.uk/>

<http://www.iowscb.org.uk/>

## **7. Responsibility for Safeguarding and Child Protection**

The SLT and centre management have a joint responsibility to ensure that the centre has policies and procedures in place in respect to safeguarding and child protection.

The centre has a designated SLT lead with special responsibility for safeguarding and child protection issues and is appropriately experienced.

The CEO and all staff working with young people vulnerable adults and those with additional needs received appropriate training to familiarise themselves with safeguarding issues and their responsibilities and the centre procedures and policies, with refresher training at least every three years. There is a senior staff member with lead responsibility for safeguarding who is the lead designated senior person (DSP) Designated senior persons.

The centre has a safeguarding board which meets regularly and has a formal constitution and terms of reference. The board is chaired by the staff member with lead responsibility for safeguarding who reports annually to the SLT.

The group includes:

- All designated safeguarding officers
- Human Resources officer
- Director of Teaching, Learning, Assessment and Quality

This group ensure that a range of resources and opportunities are in place, throughout the year to remind learners and staff of their responsibilities in relation to safeguarding and child protection. These include inductions for both staff learners, safeguarding awareness activities, constantly reminding learners and staff who they should refer issues to. Social media networking training materials have been developed and used for presentations to staff and learners. Safeguarding on-line learning materials have been developed.

### **Staff member with lead responsibility**

The designated staff member with lead responsibility for safeguarding and child protection issues is:

Bev Samuel  
Human Resources Officer  
Tel: 01794 523857  
Email: [Bev.Samuel@fntctraining.co.uk](mailto:Bev.Samuel@fntctraining.co.uk)

The Human Resources Officer reports to the SLT, chairs the safeguarding group, and liaises with curriculum coordinators and managers. Key duties include: lead responsibility for raising awareness with all staff of issues relating to the safeguarding and welfare of young people and adults, and the promotion of a safe environment for all those learning within the centre.

The staff member with lead responsibility receives training in safeguarding and also child protection issues and inter-agency working and will receive refresher training at least every two years in child protection. The post-holder is required to keep up to date with developments in safeguarding and child protection issues supported by the safeguarding board and other DSP.

The designated staff member with lead responsibility is responsible for:

- Leading and chairing the centre safeguarding board and ensuring that there are policies, procedures and systems in place to safeguard and promote the welfare of all young people and vulnerable adults and adults with additional needs
- Ensuring identified safeguarding procedures are followed and actions are agreed, monitored and achieved on relevant plans
- Managing and supporting DSP trained staff across all centres
- Overseeing the referral of cases of abuse, suspected abuse to children's social care, allegations are referred to the local authority designated officer for allegations in accordance with LSCB procedures
- Providing advice and support to staff and volunteers on issues relating to safeguarding and child protection
- Maintaining a proper record of any referral, complaint or concern in respect of abuse or safeguarding (even where that concern does not lead to a referral)
- The regular monitoring of concerns that are recorded on the safeguarding register and any escalation of high or severe risk banded concerns
- Ensuring that parents or carers of young people or adults with additional needs within the centre are aware of the centres safeguarding policy
- Liaising with schools/ transition co-ordinator in relation to safeguarding and child protection issues to ensure that appropriate arrangements are made for the pupils attending the centre
- Liaising with employers and training organisations (including work placements for young people and adults with additional needs at the centre in relation to safeguarding and child protection issues to ensure that appropriate safeguards are put in place
- Ensuring that all staff and volunteers receive basic training in safeguarding and child protection issues and are aware of the centre safeguarding policy and procedures

The designated staff member provides an annual report to the SLT setting out how the centre has discharged its duties. The staff member with Lead Responsibility is responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the SLT at the earliest opportunity.

### **Designated safeguarding officers**

Other trained designated members of staff with responsibility for safeguarding and child protection issues are:

Trisha Porter- Business Assessor (Bournemouth office)  
Tel: 07833089575  
Email: [Patricia.Porter@fntctraining.co.uk](mailto:Patricia.Porter@fntctraining.co.uk)

Sian Morris – Traineeship Teacher (Totton office)  
Tel: 02380 866664  
Email: [Sian.Morris@fntctraining.co.uk](mailto:Sian.Morris@fntctraining.co.uk)

Kelly Miller- Business Development (Romsey office)  
Tel: 07799621607  
Email: [Kelly.Miller@fntctraining.co.uk](mailto:Kelly.Miller@fntctraining.co.uk)



Julie Mair – Administrator (Totton office)  
Tel: 01794523857  
Email: [Julie.Mair@fntctraining.co.uk](mailto:Julie.Mair@fntctraining.co.uk)

Jenny Murphy – HSC Assessor  
Tel: 07825107624  
Email: [Jen.Murphy@fntctraining.co.uk](mailto:Jen.Murphy@fntctraining.co.uk)

Rebecca Landeg – Class Based Learning Manager  
Tel: 07799622913  
Email: [Rebecca.Landeg@fntctraining.co.uk](mailto:Rebecca.Landeg@fntctraining.co.uk)

Fiona Vaughan – Business Assessor (Totton/Romsey offices)  
Tel: 07500778992  
Email: [Fiona.Vaughan@fntctraining.co.uk](mailto:Fiona.Vaughan@fntctraining.co.uk)

The designated safeguarding officers:

- Report to the member of staff with lead responsibility for safeguarding
- Support the lead DSP in the review of policies, procedures and systems to safeguard and promote the welfare of all young people and adults with additional needs
- Know how to make an appropriate referral and will be available to provide advice and support to staff and volunteers on issues relating to safeguarding and child protection
- Have particular responsibility to be available to listen to young people and adults with additional needs studying at the centre or on placement and ensure they, their families and those involved are updated of any developments on a frequent basis.
- Will support individual cases , including attending initial safeguarding reviews, child protection case conferences and internal review meetings, core groups, strategy meetings, child in need meetings and multi agency review meetings (MARMS) as appropriate
- Have received training in safeguarding issues and inter-agency working, as required by and will receive refresher training at least every two years

The centre (normally via the staff member or designated senior person) will refer concerns that a young person might be at risk of significant harm to the Hampshire Children’s Services on 0845 603 5620 (24 hrs) or the relevant local authority equivalents

The centre (normally via that staff member or designated senior person) will refer concerns that a vulnerable adult/learner might be at risk of significant harm to Hampshire safeguarding adults board on 0300 555 1386 or the relevant local authority equivalents

### **Designated SLT member**

The designated member of the SLT with responsibility for safeguarding is:

Jacqueline Doherty  
First Floor Chancery house  
Premier Way  
Romsey  
SO51 9DQ

Email Work: [Jacqueline.Doherty@fntctraining.co.uk](mailto:Jacqueline.Doherty@fntctraining.co.uk)

The designated SLT is responsible for liaising with the CEO and senior staff member with lead responsibility over matters regarding safeguarding, including:

- Ensuring that the centre has procedures and policies which are consistent with the local safeguarding children boards procedures
- Ensuring that the SLT considers the college safeguarding a priority
- Ensuring that each year the SLT is informed of how the centre and its staff have complied with policy, including but not limited to a report on the training that staff have undertaken.

The SLT lead that has responsibility for allegations if the allegation is against the CEO. Their initial role would be to gather witness statements. There would need to be an internal investigation pending the content.

A chart detailing the roles and responsibilities for safeguarding and child protection is attached to **appendix 3**.

### **8. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns**

All staff are provided with safeguarding training at induction, and complete online safeguarding certificate within their first week employment. Their probation period cannot be complete until evidence of attending safeguarding training is recorded. Staff also attend refresher safeguarding training every 3 years. All staff, volunteers, external support workers and visitors are required to wear lanyards and/ or identity badges at all times.

#### **Procedure**

If a learner, young person or adult tells a member of staff about possible abuse:

#### **DO:**

- Stay calm and reassuring Listen to and take what the learner says seriously
- Tell the learner that she/he is right to tell someone
- Let him/her know that you understand how difficult it is to talk about such experiences
- Arrange a place and time where you can talk privately and uninterrupted as soon as possible
- Explain that you will need to involve other people and why
- Be supportive
- Give realistic encouragement
- Allow learner to speak



- Make written record of what is said by the learner – unprompted it needs to be made clear to staff that they can ask open questions but only when necessary in order to clarify or gather further information
- Follow the centre's internal channels of communication in relation to child protection
- Follow the colleges and LSCB Child Protection procedures
- Talk to someone about your feelings and seek support for yourself
- Let the learner know that she/he is not to blame

#### **DO NOT:**

- Promise confidentiality
- Make promises or reassurances you cannot keep
- Press for details or ask leading questions which may invalidate court proceedings or impede an investigation
- Ask the learner to repeat the details unnecessarily
- React emotionally
- Interrupt or stop a learner during a disclosure
- Underestimate your role as a trusted adult
- Forget to make time and seek support for yourself

Staff should not investigate concerns or allegations themselves, but should report them immediately to one of the Designated Senior Persons. The Lead Designated Senior Person will make appropriate referrals in accordance with LSCB guidelines.

Generally staff other than the Lead Designated Senior Officer, SLT with safeguarding lead or CEO should not make referrals, however in an emergency or if after discussion with a Designated Senior Person a member of staff believes that a referral should be made but the Designated Person does not, then in this case the referral may be made by telephone to the Children's Social Care. If this occurs, the Senior Staff Member with Lead Responsibility must be informed in order to keep records and oversee any ongoing work.

#### **Confidentiality**

Any young person or adult who wishes to disclose must be informed that the member of staff has a professional responsibility to share the relevant information about the protection of the learner with other professionals. If a young person or adult confides in a member of staff and asks for the information to be kept secret, the member of staff has a responsibility and duty of care to share the information with the Designated Senior Person. This needs to be done with care and sensitivity and the young person or adult needs to be reassured that the matter will only be discussed with people who need to know.

### **Child Protection Case Conferences**

The Centre will endeavour to be represented at all Child Protection Case Conferences to which they have been invited.

If the Centre is unable to be represented at the Child Protection Case Conference, a written report may be submitted.

### **Supporting Learners at Risk**

Statistically young people or adults with identified needs e.g. behavioural difficulties and/or disabilities are more vulnerable to abuse. Centre staff who work in any capacity with young people or adults with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse

## **9. Managing Allegations of Abuse against Adults Working in Education Settings**

The CEO and centre is required to comply with the detailed Local Safeguarding Children's Board Procedure for Managing Allegations against Adults Working in Education Settings.

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

### **Introduction**

The Centre recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those involved with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

The Centre recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the Centre will do so with sensitivity and will act in a careful, measured way.

### **Receiving an Allegation**

A member of staff who receives an allegation about another member of staff should follow the recommended guidelines for dealing with disclosure.

The allegation should be reported immediately to the Staff Member with Lead Responsibility / Human Resources or the Designated SLT officer.

Obtain written details of the allegation from the person who received it, that are signed and dated.

Record information about times, dates, locations and names of potential witnesses.

## Initial Assessment

An initial assessment of the allegation, consulting with the Staff Member with Lead Responsibility / the Human Resources or the SLT with responsibility of safeguarding and the Local Authority Designated Officer for Allegation.

An allegation is information which indicates that a person who works with a child, young person or adult with identified needs has:

- Behaved in a way that has harmed or may have harmed a child or young person.
- Possibly committed a criminal offence against or related to a child or young person.
- Behaved towards a child or young person in a way that indicates s/he is unsuitable to work with children and young people.

**It is important that the Designated Senior Person ,Human Resources officer / Senior Post holder does not investigate the allegation.** The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

If the assessment of the allegation is that it requires further investigation then the Human Resources officer with the Designated Senior Person should refer the matter to the Local Authority Designated Officer (LADO) within one working day in accordance with the detailed procedures available from the relevant LADO.

Other potential outcomes are: The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the College disciplinary procedures. The allegation can be shown to be false because the facts alleged could not possibly be true.

## Enquiries and Investigations

Child protection enquiries by Children's Social Care or the police are not to be confused with internal, disciplinary enquiries by the Centre. The centre may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct the Centre to act in a particular way; however, the Centre will assist the agencies with their enquiries.

The Centre shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform with the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the police, the CEO (or Designated Senior Person) Human Resources officer or Senior Post holder should normally be involved in, and contribute to, the inter-agency strategy discussions. The CEO / Human Resources officer / Designated Senior Person / Senior Post holder is responsible for ensuring that the Centre gives every assistance with any agencies enquiries. They will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made and suggest that he/she should consult with a representative, for example, a trade union.

The Human Resources officer (or Designated Senior Person) will consult with the police or the LADO particularly in relation to timing and content of the information to be provided, and shall:

- 1) Inform the student / learner or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.
- 2) Ensure that the parents/carers of the student/learner making the allegation have been informed verbally and in writing that the allegation has been made and what the likely process will involve and are regularly updated at each stage or at regular intervals.
- 3) Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.

The Human Resources officer (or Designated Senior Person) shall keep a written record of the action taken in connection with the allegation.

### **Suspension of Staff**

Suspension should not be automatic. In respect of staff, other than the CEO or Senior Post Holders, suspension can only be carried out by a nominated Senior Post Holder. In respect of the CEO, Senior Post Holders, suspension can only be carried out by the CEO or her deputy.

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

1. Where a student/learner is at risk.
2. Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
3. Where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

If the police are engaged in an investigation, the Officer in charge of the case should be kept up to date.

The member of staff should be advised to seek the advice and / or assistance of his / her trade union and should be informed that they have the right to be accompanied by a work colleague or trade union representative. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension.

The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response.

If a Senior Post holder considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one working day.

Where a member of staff is suspended, the Human Resources officer / Senior Post holder or Designated Senior Person should address the following issues:

1. The SLT should receive reports from HR detailing any suspensions
2. Where the CEO has been suspended, the SFA/EFA will need to take action to address the management of the centre
3. The parents / carers of the learner making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student/learner making the allegation of the suspension.
4. Senior staff who need to know of the reason for the suspension should be informed.
5. Depending on the nature of the allegation, the CEO should consider whether a statement to the learners of the Centre and / or parents / carers should be made, taking due regard of the need to avoid unwelcome publicity

The Senior Post holders / Principal / Human Resources officer / Designated Senior Persons shall consider carefully and review the decisions as to who is informed of the suspension and investigation. The LADO and external investigating authorities should be consulted and updated.

The suspended member of staff should be given appropriate support during the period of suspension. He / she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the Centre disciplinary procedures.

### **The Disciplinary Investigation**

The disciplinary investigation, if deemed necessary should be conducted in accordance with the existing centre disciplinary procedures. The member of staff should be informed of:

The disciplinary charge against him/her.

His/her entitlement to be accompanied or represented by a trade union representative or work colleague.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling and support at any stage.

The learner or learners making the allegation and / or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to Centre of the member of staff (if suspended).

The Senior Post holders / CEO (or Designated person) should give consideration to what information should be made available to the general population of the CEO.

### **Allegations without Foundation**

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Children's Social Care in order that other agencies may act upon the information.

In consultation with Senior Post holders / Human Resources officer , Designated Senior Person, will contact the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence.

Inform the parents / carers of those involved that the allegation has been made and of the outcome.

Where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.

Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

In some circumstances, consider the broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

### **Records**

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained. If a member of staff is dismissed or resigns before the disciplinary process is completed, he / she should be informed about the Centres statutory duty to notify the Disclosure and Barring Service (DBS).

### **Monitoring Effectiveness**

Where an allegation has been made against a member of staff, the Staff Member with Lead Responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the Centres procedures and/or policies and/or which should be drawn to the attention of the SLT. Consideration should also be given to the training needs of staff.

## **10. Safer Recruitment Policy statement**

The Centre aims to recruit, reward and retain the best available people and to make the maximum possible use of the abilities of all its employees whilst ensuring it safeguards and promotes the welfare of young people vulnerable adults and adults with additional needs receiving education and training at the Centre or in the workplace.

In accordance with legislation and guidance, the Centre has a comprehensive Safer Recruitment Policy & Procedure together with separate policies and procedures in respect of recruitment of ex-offenders and the new Disclosure and Barring Service.

All staff and volunteers are required to complete an enhanced Criminal Records Bureau disclosure prior to commencement of employment or voluntary work with the Centre if they are to have “regulated activity” and will only be permitted to have supervised access to young people and vulnerable adults until clearance has been received.

### **11. Evaluation and review of the policy and procedure**

This policy will be annually reviewed by the SLT member with lead responsibility following the annual safeguarding report and in conjunction with the safeguarding board.

### **12. To be read in conjunction with**

- Safer recruitment policy (staff and volunteers)
- Policy & Procedure on the recruitment of ex-offenders
- policy on vetting & barring and CRB disclosure for recruitment of staff and volunteers
- code of professional conduct
- data protection code of practice
- student acceptable use policies : internet & email
- anti-bullying & harassment policy & procedure
- single equality policy
- single equality scheme
- whistleblowing procedure
- hospitality, gifts & gratuities policy
- physical contact & restraint policy
- first aid policy
- work experience policy for learners
- photography & videos policy
- health & safety policy health, safety & welfare work placement details and assessment record
- safeguarding information for students
- stay safe online information for students
- disciplinary policies & procedures for staff & learners
- behaviour management guidelines
- peeps (personal emergency evacuation plan )

**Types and possible signs of child abuse**

It is important to remember that lists such as the one below are neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances.

There can be an overlap between all the different forms of child abuse and all or several can co-exist.

**1. Physical abuse**

Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after.

Signs of possible physical abuse:

- Unexplained injuries or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Untreated injuries, or delay in reporting them.
- Excessive physical punishment.
- Arms and legs kept covered in hot weather
- Fear of returning home.
- Aggression towards others.
- Running away

When considering the possibility of non-accidental injury it is important to remember that the injuries may have occurred for other reasons, eg genuine accidents or medical disorders.

**2. Neglect**

Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food clothing or shelter, failing to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.

Signs of possible physical neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness and/or unexplained non-attendance at College
- Untreated medical problems



- Low self-esteem
- Poor peer relationships
- Stealing

### 3. Emotional abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause serious and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. It may involve conveying to children that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may involve ridiculing them or making fun of the way they speak. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all forms of abuse.

Signs of possible emotional abuse:

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Socio-emotional immaturity
- 'Neurotic' behaviour (e.g. rocking, head banging)
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

### 4. Sexual abuse

Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts, kissing, rubbing, and masturbation, touching under or over clothes. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, Female genital mutilation.

Signs of the sexually abused child:

Not all children are able to tell parents that they have been assaulted. Changes in behaviour may be a signal that something has happened.

These are general indicators that child may be troubled though not necessarily about a sexual assault. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that will alert you to a problem. Try to notice all changes in usual behaviour.

It is important to remember that in sexual assault there may well be no physical or behavioural signs.

Signs of possible sexual abuse:

### **A Behavioural**

- Lack of trust in adults or over-familiarity with adults
- Fear of a particular individual
- Social isolation – withdrawal or introversion
- Sleep disturbance (nightmares, irrational fears)
- Running away from home
- Girls taking over the mothering role
- Reluctance or refusal to participate in physical activity or to change clothes for physical activities
- Low self-esteem
- Drug , alcohol or solvent abuse
- Display of sexual knowledge beyond the child's years
- Unusual interest in the genitals of adults or children or animals
- Expressing affection in inappropriate ways, eg 'French kissing'
- Fear of bathrooms, showers, closed doors
- Abnormal sexualised drawing
- Fear of medical examinations
- Developmental regression
- Poor peer relations
- Over-sexualised behaviour
- Compulsive masturbation
- Stealing
- Psychosomatic factors, eg recurrent abdominal pain or headache
- Sexual promiscuity

### **B Physical / Medical**

- Sleeplessness, nightmares, fear of the dark
- Bruises, scratches, bite marks on top of the thighs or genital areas
- Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Pain on passing urine or recurrent urinary infection
- Stained underwear
- Unusual genital odour
- Anxiety/depression
- Eating disorder, e.g. anorexia nervosa or bulimia
- Discomfort/difficulty in walking or sitting
- Pregnancy – particularly when reluctant to name father
- Venereal disease, sexually transmitted diseases

- Soiling or wetting in children who have been trained
- Self- mutilation/suicide attempts

Others risks to children and vulnerable adults include:

**5. Risk to Self and/or others**

This may include but is not exclusive to self harm, Suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal trauma or stress.

**6. Domestic Violence**

This can be physical, emotional, Sexual, neglect. This category also covers forced marriages.

**7. Cyber Bullying**

Cyber bullying is the deliberate use of technology to bully and harass another person.

**8. Female Genital Mutilation**

This is the practice which is traditional in some cultures of partially or totally removing the external genitalia of girls and young women for non medical reasons.

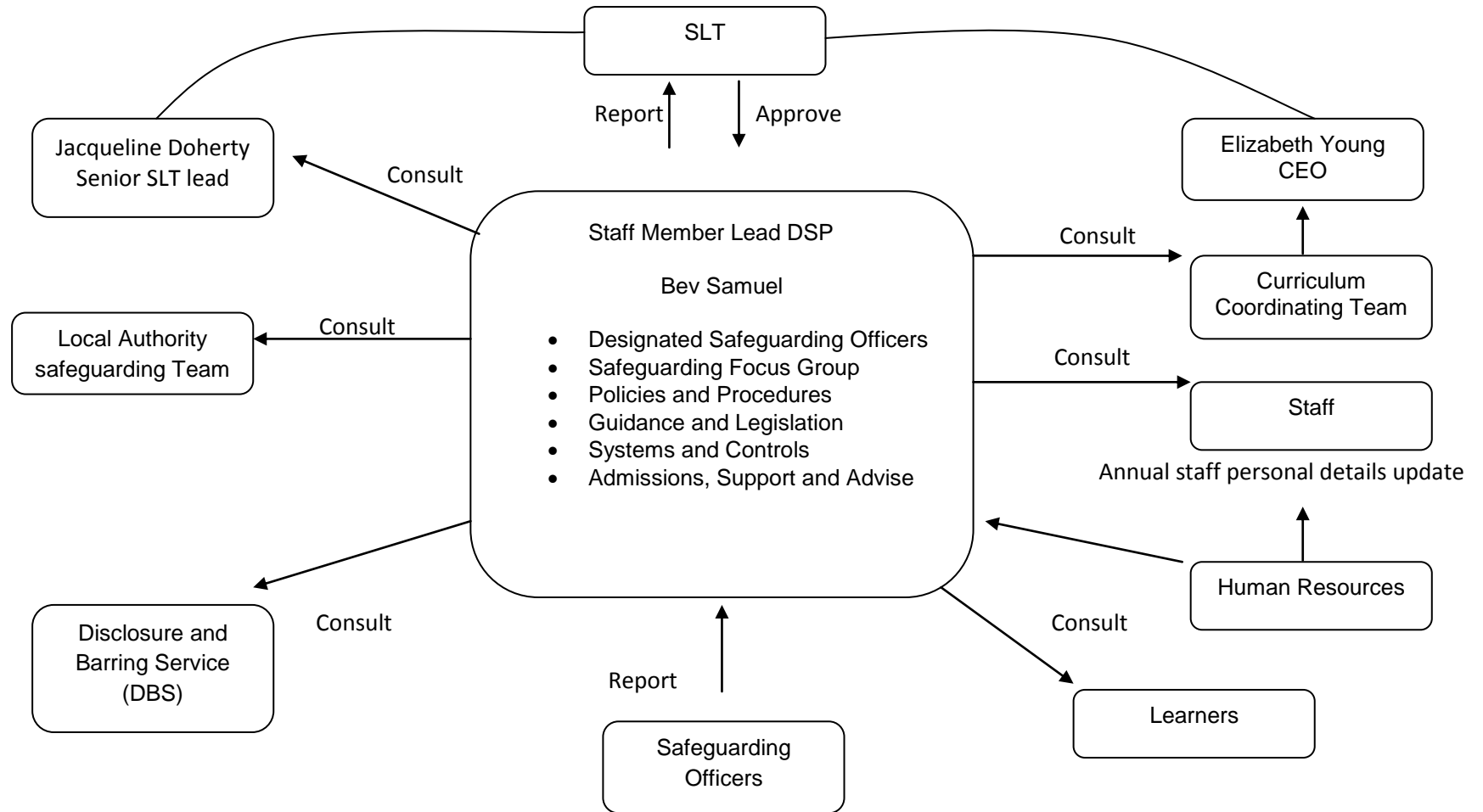
**9. Extremism/ Radicalisation**

We define 'extremism' as vocal or active opposition to fundamental British values. – Please refer to Prevent policy and procedure

## Appendix 2

Type of harm to Vulnerable Adults	Meaning	Examples
<b>Emotional / Psychological</b>	Action or inaction by others that cause mental anguish	Inflexible regimes and lack of choice. Mocking, coercing, denying privacy, threatening behaviour, bullying, intimidation, harassment, deliberate isolation, deprivation, Gender based discrimination, Forced marriage.
<b>Financial</b>	Usually associated with the misuse of money, valuables or property	Unauthorised withdrawals from vulnerable adult's bank account, Financial control over a person, theft, fraud, exploitation, pressure in connection with wills or inheritance.
<b>Physical</b>	Any physical contact that results in discomfort, pain or injury	Hitting, slapping, pushing, shaking, bruising, failing to treat sores or wounds, under or overuse of medication, un-prescribed or inappropriate medication, use of restraint or inappropriate restraint, inappropriate sanctions
<b>Sexual</b>	Coercion or force to take part in sexual acts	Inappropriate touching. Causing bruising or injury to the anal, genital or abdominal area. Transmission of STD. Female Genital Mutilation
<b>Neglect</b>	Failure to identify and/or meet care needs	Untreated weight loss, . Poor hygiene, soiled clothes not changed, insufficient food or drink, , unmet social or care needs.
<b>Verbal</b>	Any remark or comment by others that causes distress	Demearing, disrespectful, humiliating, racist, sexist or sarcastic comments. Excessive or unwanted familiarity, shouting, swearing, name calling.

Roles and Responsibilities for Safeguarding & Child Protection



**Centre safeguarding & child protection key contacts**

**Staff Member with Lead Responsibility**

Jacqueline Doherty - Director of Teaching, Learning, Assessment and Quality  
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Email: [Jacqueline.Doherty@fntctraining.co.uk](mailto:Jacqueline.Doherty@fntctraining.co.uk)

**Designated Senior Person**

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Human Resources Officer  
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Email: [Bev.Samuel@fntctraining.co.uk](mailto:Bev.Samuel@fntctraining.co.uk)

**Designated Safeguarding Officers**

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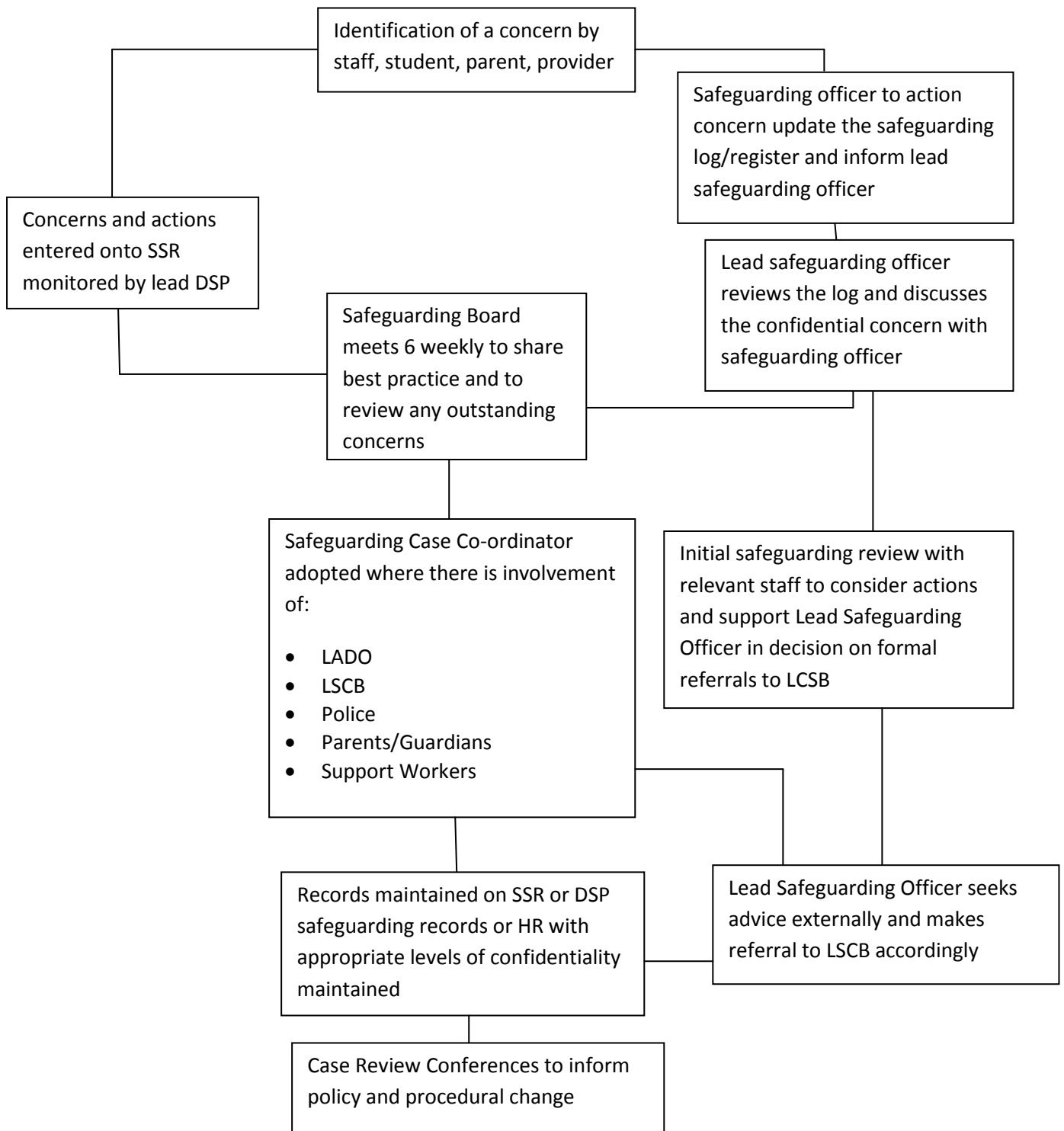
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**Appendix 5**

**Reporting Safeguarding Concerns**





## Prevent Policy and Procedure

### **1. Introduction**

The current threat from terrorism and extremism in the United Kingdom is severe and real and can involve the exploitation of vulnerable people including children and young people.

This policy sets out FNTC commitment to support the prevention of extremism and radicalisation.

### **2. Policy Aim**

This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the channel process.

### **3. Definitions**

**Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

**Extremism** is vocal or active opposition to fundamental British values, including democracy, the rules of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011)

### **4. The Law**

Prevent is 1 of the 4 elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism, and promotes safeguarding of vulnerable people. In 2011 the government strategy of PREVENT was implemented. The strategy has three strands, which assists the breakdown of how to address the issues.

#### Address IDEOLOGICAL CHALLENGE

Restricting availability of online propaganda. Make it as difficult as possible for them to find civil society groups- they all have an online presence. Campaigns and projects run locally and nationally.

#### Address SUPPORTING INDIVIDUALS

Through the Channel programme.

Address the individual's vulnerabilities and put a range of programmes in place.

Mentoring provisions- over 200 people have received support nationally through the Channel programme.



## Address WORKING WITH INSTITUTIONS

Where can these issues manifest themselves- schools, colleges, mosques etc.  
Encourage staff to work across institutions, maintaining an attitude of 'it could happen here'.

### **5. Scope**

FNTC holds a responsibility, highlighted in the third strand, to ensure all staff and students have knowledge in recognising risk and addressing it appropriately. Strategies to meet this obligation include; staff induction and via CPD sessions for staff, and learning sessions and an open discussion forum across the centre.

### **6. Risk factors**

Vulnerability – failure to integrate into society, disrupted childhood  
Influence- psychological affiliations with the cause, susceptibility to influence, family or friends around them  
Receptiveness- disillusionment with current state of affairs to ideological narrative, previous beliefs and understanding, lack of knowledge and awareness  
Challenging behaviour- Also, to have a lack of barriers and obstacles from radicalisation being acceptable and normal, and to stop them getting involved  
eSafety- ensuring students are educated fully about online safety and understanding of grooming online, and what to do if they have concerns.

### **7. Susceptibility factors**

Psychological Crisis- an individual is threatening harm to; him or herself, others, campus property or is out of touch with reality due to a severe drug reaction or a psychotic breakdown.  
Identity Crisis- a period of uncertainty and confusion in which a person's sense of identity becomes insecure, typically due to a change in their expected aims or role in society.  
Moral Outrage- a response to the behaviour of others, never one's own  
Group bonding- a student becoming closely affiliated with others who may use techniques such as grooming and peer pressure in order to entice vulnerable individuals.  
Mobilising Network- once the group has bonded, mobilising the network of those influenced to encourage them to complete tasks, which may be dangerous or against the law

### **8. Behavioural Matters**

8.1 The channel assessment framework contains three areas of concern which may assist staff in recognising some of the behaviours that may highlight vulnerabilities requiring referral. These include but are not limited to:

- Engagement with a group, cause or ideology
- Feelings of grievance and justice
- Feeling under threat
- A need for identity, meaning and belonging

- A desire for status
  - A desire for excitement and adventure
  - A need to dominate and control others
  - Susceptibility to indoctrination
  - A desire for political or moral change
  - Opportunistic involvement
  - Family or friends involvement in extremism
  - Being at a transitional time of life
  - Being influenced or controlled by a group
  - Relevant mental health issues
- 
- Intent to cause harm
  - Over-identification with a group or ideology
  - 'Them and Us' thinking
  - Dehumanisation of the enemy
  - Attitudes that justify offending
  - Harmful means to an end
  - Harmful objectives
  - Capability to cause harm
  - Individual knowledge, skills and competencies
  - Access to networks, funding or equipment
  - Criminal capability

## **9. Responsibilities**

Single point of contact (SPOC) = Bev Samuel, [Bev.Samuel@fntctraining.co.uk](mailto:Bev.Samuel@fntctraining.co.uk)

Senior manager responsible for Prevent = Jacqueline Doherty,  
[Jacqueline.Doherty@fntctraining.co.uk](mailto:Jacqueline.Doherty@fntctraining.co.uk)

All staff have a responsibility to report any concerns relating to radicalisation and/or extremism

## **10. System of Referral**

### Identification of concern

In the event of noticing changes about a learner that are in relation to vulnerabilities towards radicalisation and extremism, or having concerns for their welfare, one should first make a full written descriptions of concerns.

### Internal Referral

The staff member should then contact the single point of contact (SPOC) , and pass the compressive notes to them or in his/her absence the senior manager responsible for Prevent

### Analysis and Consultation

The SPOC will take action on a case-by –case basis according to the information that has been given to them. And in conjunction with the senior manager will then make any assessments or external referrals as required. All staff are responsible for the safeguarding of the students in our care, and observations should be passed on in a timely manner.

### External Referral

All staff should have knowledge of this, the centres PREVENT policy, and should refer concerns to external relevant partners accordingly.

### **11. Information for staff**

The following is given to all new staff as part of an information sheet at their induction, with accompanying advice.

- P-** Promotion of Equality and Diversity and positive relationships between students
- R-** Referral of any concerns via safeguarding staff to relevant authorities
- E-** Education for students on all courses
- V-** Vetting and removal of any posters or other materials of an extremist nature
- E-** Environment – a safe and secure site with sufficient security procedures and online filters
- N-** News monitoring for any concerns in the locality
- T-** Training of staff to raise awareness of the signs and risks

### Equality and Diversity

FNTC actively promotes equality and diversity, more information on this can be found in the Equality and Diversity policy

### Promoting British Values

An element of the PREVENT strategy also includes positive promotion of British values, namely; democracy, rule of law, individual liberty and tolerance and respect for others. FNTC is committed to promoting these values.

### **12 Evaluation and Monitoring**

This policy will be monitored by the Equality and Diversity board and Safeguarding Board. Alongside the prevent strategy and action plan reporting to SLT on new developments and legislation that may impact FNTC and its work with learners and employers. The lead senior manager with responsibility for prevent will submit to SLT annually a reviewed policy



**13. To be read in conjunction with**

Prevent strategy

Prevent action plan

Prevent poster for staff and students

Student handbook

Equality and Diversity Policy

PP-DTLAQ-09

Acceptable use of ICT Policy

PP-OM-06


Recruitment Policy

PP-HRO-03

Initial Equality Impact Assessment	
Audit Prompt	Response
Name of document: Safeguarding policy and procedure	
Author of document: Tina Turner	
<b>Initial screening questions</b>	
1. What is the aim or purpose of the document?	<p>This policy aims to detail the framework for promoting and ensuring the safeguarding and protection of all who learn, work and visit FNTC Training and Consultancy Ltd. This policy and procedures replaces version 1.1b Dated Jan 15</p> <p>Safeguarding in this context means recognising that the needs, well-being and safety of all people are considered at all times, and that actions relating to this are in line with legislative requirements and government recommendations.</p>
2. Who is affected by the document? <ul style="list-style-type: none"> <li>• Staff</li> <li>• Learners (please indicate which groups)</li> <li>• Members of the general public (please specify who)</li> </ul>	All learners, staff and all who access the centre are in scope of this policy
3. Has anyone complained about the document? (if yes, give details)	No
4. Does the document have the potential to cause adverse impact or discriminate against different groups of people?	No
5. Does the document make a positive contribution to equality & diversity in the Centre?	Yes

A full impact assessment will be needed if this initial screening reveals an adverse impact, or potential for adverse impact on people with protected characteristics.

Refer to full Impact Assessment (Yes/No) and reasons why	No – satisfactory initial screening
If yes, Priority Level (High, Medium, Low)	

Signed: \_\_\_\_\_  \_\_\_\_\_ Name: Jacqueline Doherty Date: 1.4.16