



Safeguarding and Prevent Duty Policy



Policy Approval					
Approval Required	Indicate with a tick (P)		Annual Review Required	Indicate with a tick (P)	
	Yes P	No		Yes P	No
Approval Panel	Managing Director: Sara Goldie Member of the Advisory Board: Nikki Witham				
Approved by	Name:		Signature:		Date:
	Name: Nikki Witham		Signature: 		Date: 21 Dec 2021
Policy Review Date	Aug 2022				

POLICY STATEMENT

Leaders in Business are fully committed to safeguarding the welfare of our learners. The development and implementation of this policy and procedures are an integral part of Leaders In Business' determination to provide high-quality responsive services, which meet the needs of our customers and service users.

All staff, associates and volunteers have a responsibility to take appropriate steps to protect our learners at risk and to understand their responsibility to operate within this policy. Good safeguarding includes arrangements for prevention as well as responding to allegations of harm and abuse. Harm and abuse may include physical, sexual, psychological, financial and institutional abuse, acts of neglect and omission and discrimination. All allegations concerns or suspicions of abuse or neglect are taken seriously by Leaders in Business and responded to in line with our procedures and within the reporting structures of the local authority in which we work.

Allegations made against members of staff will be dealt with. Leaders in Business handle all disclosures in accordance with the requirements of a national framework of standards and good practice and outcomes in Adult protection (ADASS 2006). This policy states our approach to preventing and responding to safeguarding issues.

INTRODUCTION

Leaders in Business fully recognises its statutory and moral duty to promote the safety and welfare of those learners who are under the age of 18 years and those adult learners who are deemed to be vulnerable; however; Leaders in Business has a moral duty and is committed to the safeguarding of all learners regardless of their age and vulnerability.

This policy has been developed in accordance with the principles established by the:

- Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf
- The Care Act (2014). Statutory guidance: Care and support statutory guidance updated June 2020 that provides a detailed guidance on all aspects of implementing the requirements contained in Part 1 of the Care Act (2014) to local authorities, the NHS, police and other partner organisations. (Department of Health and Social Care)
<https://www.gov.uk/government/publications/care-act-statutory-guidance/careandsupportstatutory-guidance>
- The Prevent Duty: Departmental advice for schools and childcare providers (Department for Education. June 2015). <https://www.gov.uk/government/publications/protecting-children-from-radicalisationthepreventduty>
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (Her Majesties Government, July 2018)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

All staff should ensure that they have read and understood the associated policies to support the effective implementation of the safeguarding policy and procedures.

SCOPE

This policy and its procedures will apply to:

- The Board
- Employees of Leaders in Business
- Learners
- Contractors
- Employers providing work placements
- All other users of Leaders in Business
- All Leaders in Business activities

The Policy and Procedures will apply at all times when Leaders in Business is providing services or activities that come under the responsibility of the organisation.

COMMUNICATION AND DISSEMINATION OF THE POLICY

Leaders in Business recognises that safeguarding and promoting the welfare of its learners is everyone's responsibility. Everyone who comes into contact with a learner and their families, carers and employers has a role to play in safeguarding. The safeguarding policy is shared with all staff, learners and employers on an annual basis and as and when any in-year updates are made aligned to legislation changes.

The policy, its purpose and reporting procedures will be reinforced via team and employer meetings, staff training, learning resources and literature. Additional support and guidance will be provided to ensure that any learner with a learning difficulty or language barrier can access the policy, its aims and supporting literature.

All staff have read and confirmed their understanding of the Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021).

SAFER RECRUITMENT AND TRAINING FOR STAFF

When recruiting new members of staff, Leaders in Business follows the government statutory guidance set out in Part 3 of KCSIE (2021), which details Safer Recruitment pay due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedom Act 2012.

Leaders in Business adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that the relevant staff member uses the DBS checking service to assess applicants' sustainability for positions of trust. The company also complies fully with the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Newly appointed staff will have a job role induction to include a robust introduction into the safeguarding of children, young people and adults at risk policy and procedures. This includes mandatory reading of internal and external policies and e-learning modules.

DEFINITIONS

Although legislation is specifically related to children and vulnerable adults as defined below, Leaders in Business is committed to the safeguarding of all learners and the term learner is used throughout this policy.

Child - In terms of this policy, a child is defined as anyone who has not reached their 18th birthday.

Vulnerable Adults - In terms of this policy, a vulnerable adult is defined as a person aged 18 years or over and who is or may be in need of community care services by reason of mental or other disability, age or illness and 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. This may include a person who has a learning difficulty, a physical or sensory disability or a mental illness.

Definition of Safeguarding: Safeguarding and promoting the welfare of learners is defined in 'Working Together to Safeguard Children (2018)' as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Note: Learners with additional needs and/or disabilities can face further safeguarding challenges. It is essential that these learners are given the support and guidance to remove barriers.

SAFEGUARDING ACTIONS MAY BE NEEDED TO PROTECT LEARNERS FROM THE FOLLOWING:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Bullying including cyberbullying
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence / violence against women and girls (VAWG)
- Mental health
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking
- Sexual Violence
- Sexual Harassment

Staff need to have an awareness of the different types of safeguarding issues and explanations and definitions (Appendix c). Staff should also be aware that behaviours linked to, for example, drug taking, alcohol; abuse, truancy and sexting also put learners in danger.

Leaders in Business take their safeguarding responsibilities very seriously and as such will not tolerate any forms of abuse, bullying or harassment.

LOOKED AFTER CHILDREN

All staff need to be aware of issues around safeguarding looked after children. The most common reason for young people becoming looked after is as a result of abuse and/or neglect.

LEARNERS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

All staff need to be aware that additional barriers can exist when recognising abuse and neglect in learners with special educational needs (SEN) and disabilities. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration.
- Learners with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- Staff should refer to the learner's education, health care plan (HCP). This will provide additional guidance specific to the learner's support needs.
- Leaders in Business recognises that safeguarding is not just about protecting learners from deliberate harm, neglect and failure to act. It relates to the broader aspects of care and education and the following procedures should be read in conjunction with this policy:
 - Health and Safety Policy
 - Safer Recruitment Policy and Guidelines
 - Learner Behaviour Policy
 - External Speakers and Events Policy

PROCEDURE FOR STAFF

If Leaders in Business staff have concerns about a learner:

- If staff members have any concerns about a learner, this must be referred to the Designated Safeguarding Lead, to agree a course of action. Options can include referral to specialist services or early help services. Leaders in Business recognises its role in identifying learners who may benefit from early help and providing support as soon as a problem emerges in a learner's life. Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment. The DSL will be required to report a referral immediately to the local safeguarding authority.

- If early help is appropriate, the Safeguarding Lead will support the staff member to liaise with external agencies. The learner should then be monitored and if the situation does not appear to be improving, a referral will be made by the Designated Safeguarding Lead and to the Local Authority Designated Officer (LADO) or Local Safeguarding Board to ensure the learner's situation improves.
- Prevent related concerns should also be escalated to the designated safeguarding lead immediately who will refer to the regional Prevent Coordinator for advice and guidance.

If Leaders in Business staff believe a learner is in immediate danger or at risk of harm:

This immediate concern must be reported to the Designated Safeguarding Lead and if a learner is in immediate danger or is at risk of harm, a referral will be made to the Local Authority Designated Officer (LADO), Safeguarding Board or to the police immediately.

Staff responsibilities or 5Rs are summarised as:

- 1. Recognise**
- 2. Respond**
- 3. Record**
- 4. Report**
- 5. Refer**

IF A LEARNER MAKES A DISCLOSURE TO A MEMBER OF STAFF

- If a learner makes a disclosure to a member of staff, the learner should be acknowledged, taken seriously and listened to.
- As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that you have a legal obligation to pass this information on to a Designated Safeguarding Lead. You cannot promise confidentiality to the learner. Reassure the learner but tell them that a record of information given will be made.
- It is important not to ask too many questions as you must not under any circumstances investigate any accusations.
- Allow the learner to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details of what has been told to you using the Safeguarding Disclosure Form. Concern / Disclosure Form (Appendix A). Contact the Designated Safeguarding Lead immediately to explain the situation and pass on the written notes. The Designated Safeguarding Lead will outline the action that he/she has to take so that you can explain this to the learner. It may be appropriate for the Designated Safeguarding Lead to meet the learner. You must not take any further action yourself. This includes contacting parents/carers or outside agencies. The DSL will be required to report a referral immediately to the local safeguarding authority.

MEMBER OF STAFF RECEIVES INFORMATION ABOUT A LEARNER FROM ANOTHER PERSON

If a member of staff receives information about a learner, which suggests that there is a safeguarding issue or that this is likely, this must be recorded on the Safeguarding Concern / Disclosure Form and reported immediately to the Designated Safeguarding Lead. Leaders in Business has a duty to refer these concerns to the Local Authority Children's Social Care Office for the area in which the learner lives or to the police if the learner is in immediate danger.

IF A MEMBER OF STAFF SUSPECTS A LEARNER HAS A SAFEGUARDING CONCERN

If a member of staff suspects that a learner is at risk from a safeguarding issue, they must discuss these concerns with the Designated Safeguarding Lead and not take any independent action. The concerns must be recorded on the Safeguarding Concern / Disclosure form.

All contact with outside agencies over issues of safeguarding must be approved by the Designated Safeguarding Lead. The Designated Safeguarding Lead will decide whether to make a referral to children's social care, Local Safeguarding Board or Local Authority Designated Officer (LADO).

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

Parents / carers have the right to be informed in respect of any concerns or any action taken to safeguard and promote their welfare, providing this does not compromise the learner's safety. Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021).

ALLEGATIONS OF ABUSE MADE AGAINST OTHER YOUNG PEOPLE

Staff must recognise that young people are capable of abusing their peers and be aware that safeguarding issues can manifest themselves via peer on peer abuse. Peer on peer abuse is abuse young people may experience from their peers (people of their own or similar age) perpetrated by a young person/s (under the age of 18 years)/vulnerable adult/s on young person/s/vulnerable adult/s.

Staff need to be aware that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Leaders in Business will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns, directly to their trainer or to the Safeguarding Team.

Peer on peer abuse can take the form of bullying (including cyber-bullying) sexting and any other form of sexual or physical abuse. Gender based issues can also occur for example girls being sexually touched/ assaulted or boys being subject to initiation/hazing type violence.

VISITORS

All official visitors to Leaders in Business premises are required to report to the main reception on arrival and sign in. Visitors are issued with a visitor pass on a Leaders in Business lanyard which must always be worn and visible. Visitors are asked to wait in reception until they are collected by a member of staff. Visitors are not permitted to enter access-controlled areas unless accompanied by a member of staff.

Guest Speakers will be subject to the guest speaker policy vetting procedure.

All centres must carry out appropriate checks on the material that is being presented prior to a guest speaker event. The relevant checks must be made against all guest speakers before any event is approved. Guest speakers are not permitted to work alone with any learners and will always be accompanied by a trainer. The Guest Speaker approval form must be completed prior to the event and shared with the DSL.

WORK SETTINGS

Leaders in Business, has a responsibility to ensure the health, safety and welfare of all learners undertaking work experience/placements with employers.

Leaders in Business, will ensure that employers are aware of this policy and their responsibilities for compliance in relation to Safeguarding and the Prevent duty for any learner who is placed with them and that arrangements are in place to ensure that a learner's wellbeing is safeguarded.

LEARNERS WITH CRIMINAL CONVICTIONS

Leaders in Business is committed to the fair treatment of all learners and welcomes applications from a wide range of individuals, including those with criminal convictions. Leaders in Business is committed to the equality of opportunity and selects individuals based on their skills, qualifications and experience and not on their background or personal circumstances. Having a criminal conviction will not necessarily prevent someone from studying at Leaders In Business.

Leaders in Business is mindful, however, of the duty of care it owes to its learners, staff and the wider community to act reasonably to protect their health, safety and welfare. As a consequence, Leaders in Business requires all applicants to disclose any criminal convictions on application and re-enrolment.

If a criminal conviction is disclosed or otherwise brought to our attention, Leaders in Business, will work with that person to determine the level of risk posed by the conviction to both the individual and/or to others.

The individual will be required to complete a safeguarding risk assessment, providing Leaders in Business with further information about the offence and contact details for any relevant third party e.g. a Probation Officer.

The information given on the Disclosure Form will then be used to assess whether there is any risk posed should the individual enrol on a course at Leaders In Business. An interview must take place with one of the nominated Safeguarding Lead to enrolment to approve the application and sign the enrolment form. Where medium/high risk has been identified, this will be referred to the Safeguarding Operational Group and enrolment deferred until a decision is reached.

CONCERNS ABOUT ANOTHER STAFF MEMBER

It is recognised that sometimes allegations may involve a member of Leaders in Business staff. In these circumstances the allegation must be reported directly to the Managing Director.

In the absence of the Managing Director, the Contracts Manager must be informed. On receipt of such an allegation, Leaders In Business's Disciplinary Procedures relating to allegations of abuse will be followed.

Additionally, the Chair of the Board will be notified if the allegations relate to the Managing Director.

CONCERNS ABOUT SAFEGUARDING PRACTICES

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the Leaders In Business's safeguarding practices and that such concerns would be taken seriously by the Management and Leadership Team.

If staff members have any concerns about the safeguarding regime, they should raise this initially with their Line Manager. If no immediate action is taken, then appropriate Whistleblowing Procedures are in place for such concerns to be raised with the Management and Leadership Team.

Where a staff member feels unable to raise an issue with Leaders in Business or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: General guidance can be found at - Advice on whistleblowing.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

RESPONSIBILITIES

THE BOARD

The Board will:

- Ensure that Leaders in Business has an effective Safeguarding Policy in place which is updated annually and that Leaders in Business contributes to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children 2018' and Keeping Children Safe in Education (KCSIE. (Department for Education, September 2021)
- Ensure that the Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB).
- Ensure that Leaders in Business complies with the Prevent Duty as set out in the Counter Terrorism and Security Act 2015.
- Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote learners' welfare.
- Appoint a Board Member with responsibility for Safeguarding and Prevent who will liaise with the Managing Director and the Designated Safeguarding Lead.
- Ensure that a Designated Safeguarding Lead is appointed to lead on safeguarding, advise/support staff and liaise with the Local Authority and other agencies. He/she will have status/authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
- Give scrutiny to regular reports which will provide detail on the numbers and types of safeguarding incidents and concerns which have arisen, along with updates from Human Resources and Workforce Development.
- Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
- Ensure that a member of the Board Body is nominated to liaise with the designated officer for the relevant local authority and partner agencies in the event of a safeguarding allegation being made against the Managing Director.

THE MANAGING DIRECTOR

The Managing Director has the overall responsibility for and oversight of Safeguarding within Leaders in Business and will ensure through the Leaders in Business Management and Leadership Team that:

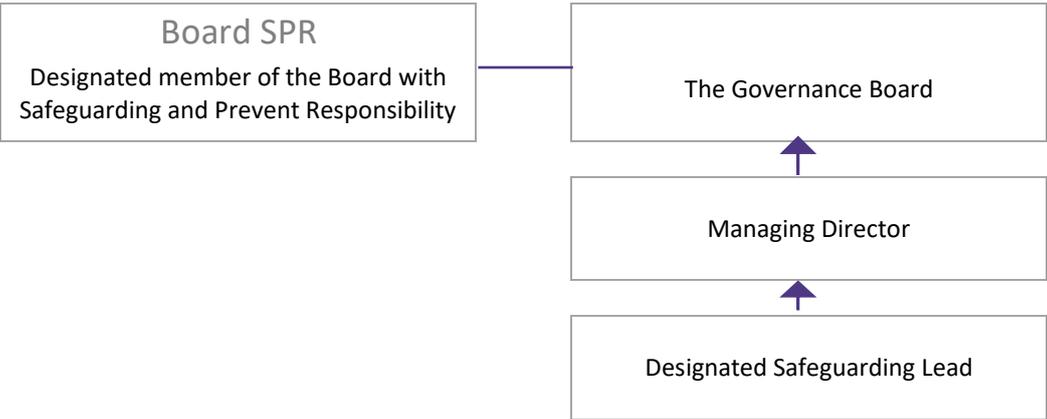
- Safeguarding policies and procedures and any linked Safeguarding policies are fully implemented and followed by all staff.
- All staff feel able to raise concerns about poor or unsafe practice regarding learners and that concerns will be addressed sensitively and in a timely and appropriate manner.
- Policy / procedures are available to parents / carers and employers on request.

THE DESIGNATED SAFEGUARDING LEAD (DSL)

The Designated Safeguarding Lead/s will:

- Ensure that the Safeguarding Policy, including Prevent, is reviewed annually and the procedures and implementation are reviewed regularly by the Personal Development, Welfare and Behaviour Action Group and the Board.
- Ensure that the Safeguarding Policy is made public and that parents/carers and employers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Leaders in Business in this.
- Provide an Annual Safeguarding report for the Board, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and Board members and number and type of incidents/cases.
- Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures.
- Ensure there is liaison with employers providing work placements to ensure proper safeguarding arrangements are in place.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding to make a referral, by liaising with relevant agencies.
- Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
- Liaise with the Safeguarding Team / any other relevant staff to inform of any issues/ongoing investigations via the Safeguarding Operations Group.
- Ensure the Safeguarding Team acts as a key point of referral for learners/ staff /parents / carers/employers, offer advice, assess information promptly, take action or refer on to the Designated Safeguarding Lead so that Leaders in Business can respond swiftly and appropriately to all concerns referrals and disclosures.
- Have access to resources and attend any relevant or refresher training courses at least every two years.
- Ensure that a member of the Safeguarding Team attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report.
- Provide staff identification badges that must be worn during all working hours.

RESPONSIBILITIES



PREVENT DUTY

The Prevent Duty, introduced as part of the Counter-Terrorism and Security Act 2015, came into effect for key bodies including schools, health bodies and police on 1 July 2015. The duty commenced for higher and further education institutions from the 18 September 2015.

The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to have “due regard to the need to prevent people from being drawn into terrorism”. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Where deemed appropriate, Leaders in Business will seek external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities and prevent them becoming further radicalised.

WHAT IS TERRORISM/EXTREMISM?

Terrorism covers all forms of extremism both violent and non-violent and is defined in the national Prevent Strategy as any vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Prevent covers international and domestic terrorist threats, and includes the activities of far-right groups, and animal rights groups.

WHAT IS RADICALISATION?

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. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Safeguarding from extremism is no different to how staff would share a concern about drugs, physical and sexual abuse or any other safeguarding concern.

WHAT IS CHANNEL?

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned

The following indicators identify factors that may suggest a young person or their family may be vulnerable to being drawn into extremism:

- Identity crisis - distance from culture religious heritage and uncomfortable with their place in the society around them.

- Personal crisis - family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and different group of friends searching for answers to questions about identity, faith and belonging.
- Personal circumstances - migration, local community tensions, events affecting Country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Potential indicators of radicalisation are listed below:

- Use of inappropriate language
- Possession or accessing violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate will be dealt with in line with the Learner Disciplinary Policy and the Code of Conduct for staff.

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred into the Channel Panel Process as per the flowchart below on the following page.

Leaders in Business has an identified single point of contact (SPOC) in relation to Prevent which is the Designated Safeguarding Lead.

To ensure compliance with the Prevent duty, all staff must make sure that they:

- Undertake training in the Prevent duty as identified by Leaders in Business to ensure they have an understanding of the factors that make people vulnerable to being drawn into terrorism and that they are able to recognise this vulnerability and are aware of what action to take.
- Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to learners.

AIMS OF THE PREVENT POLICY

This policy has the following aims:

- To promote and reinforce a set of shared values, founded on tolerance and respect for others.
- To create a safe space for free and open debate.
- To promote a sense of community cohesion.
- To ensure that learners are safe and that we create an environment that is free from bullying, harassment and discrimination.
- To support learners who may be at risk from radicalisation and to be able to signpost them to further external sources of support where appropriate.
- To ensure that staff are aware of their responsibilities under this policy and are able to recognise and respond to vulnerable learners.

This policy should be read in conjunction with Leaders in Business safeguarding policy and procedures and the Equality and Diversity Charter.

BRITISH VALUES

Defining British Values

For the purposes of this policy British values will be defined as:

“democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”

MANAGING RISKS AND RESPONDING TO EVENTS

Embedding values within the provision

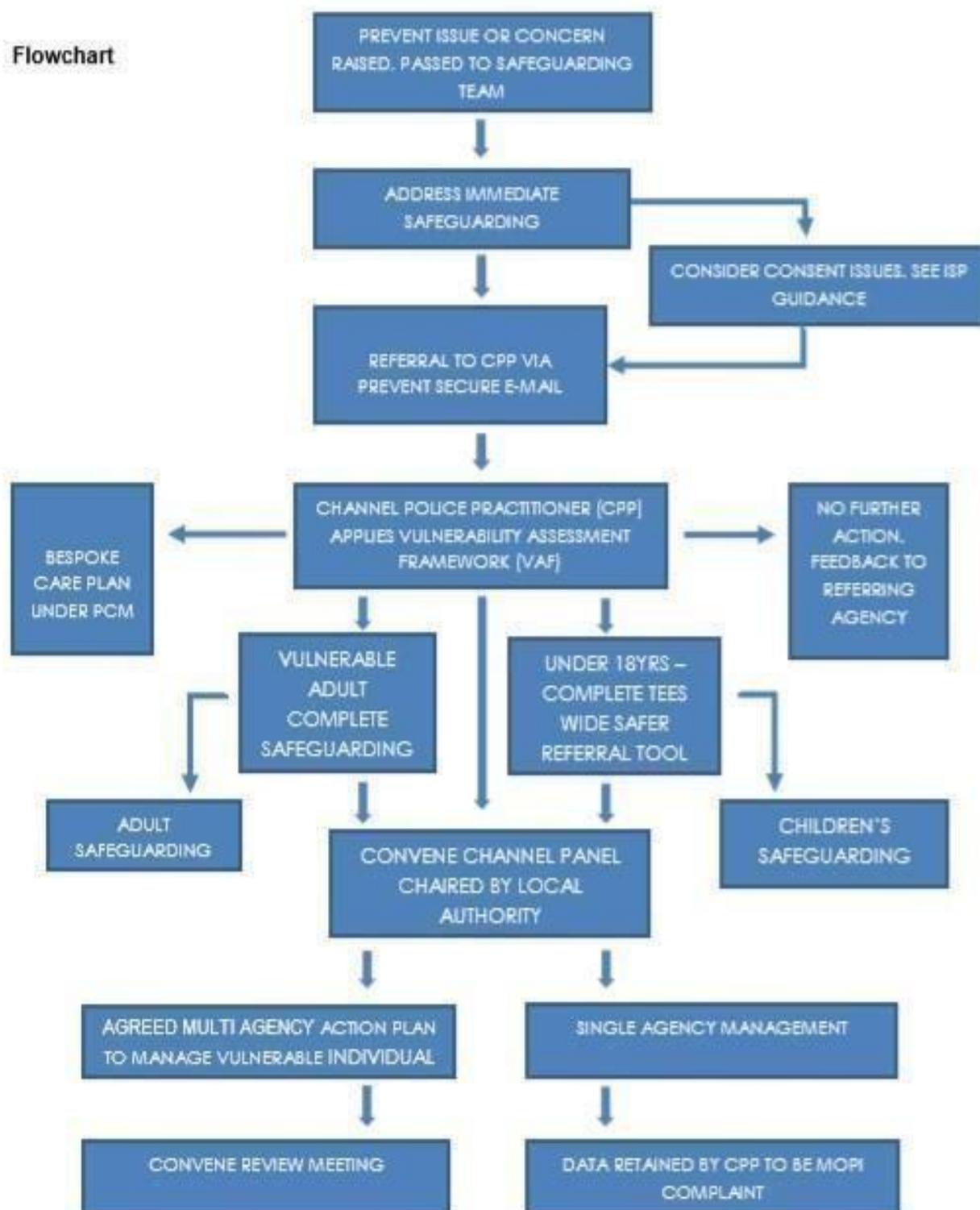
Equality and Diversity, the values of respect and tolerance will be embedded within teaching and learning sessions, learning materials and progress review meetings. Trainers will be empowered to encourage open and safe debate with support from specialist staff where this is deemed necessary.

Coordination and overall responsibilities

The Designated Safeguarding Lead, will have overall responsibility for the coordination of Prevent activity.

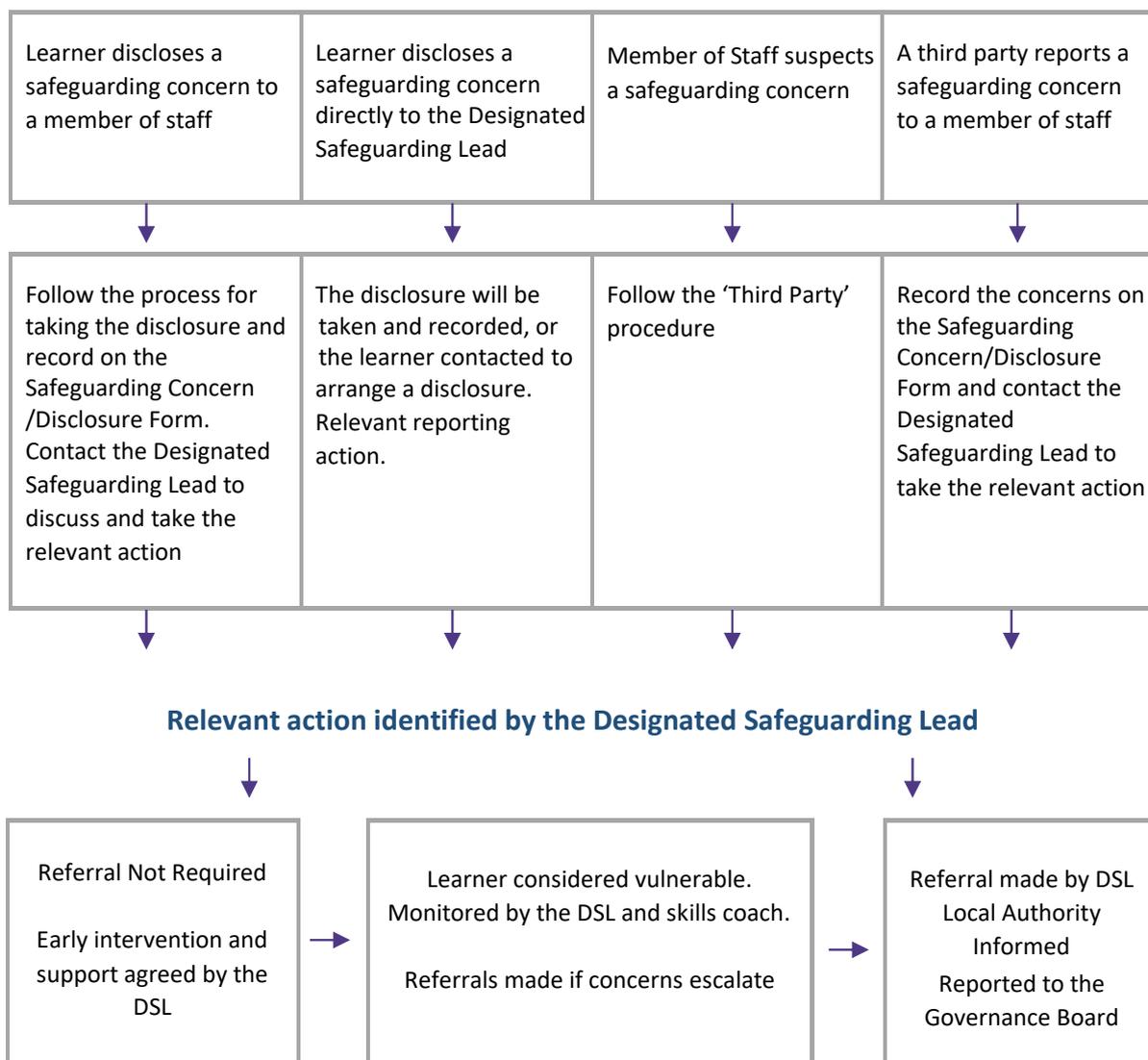
THE OFFICIAL REFERRAL PROCESS FOR PREVENT – TRAINING PROVIDERS

Flowchart



CPP - Channel Police Practitioner CPP - Channel
Police Practitioner PCM -
Primary Care Manager

SAFEGUARDING LEARNERS' PROCEDURE FLOW DIAGRAM



SAFEGUARDING/ PREVENT CONCERN / DISCLOSURE FORM

Learner Name	
DOB	
Course	
Company	
Reported by	
Reported to	
Date Reported	
<p>Details / Type of Concern / Disclosure / Current external agency involvement (also note is there are any dependents associated with the learner).</p>	
<p>Action</p>	
<p>Referred /Not Referred (tick✓) – Provide detail</p>	
<p>Follow up/ Outcome</p>	
Completed by:	Date:

APPENDIX A DEFINITIONS

(Definitions taken from Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021)

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by on definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical Abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Specific Safeguarding Issues

Bullying, including cyberbullying: Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, Leaders in Business staff should report their concerns to a member of the Safeguarding Team. Even where safeguarding is not considered to be an issue, Leaders in Business may need to draw on a range of external services to support the learner who is experiencing bullying, or to tackle any underlying issue which has contributed to a learner engaging in bullying. Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities.

It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously the Leaders In Business's first priority but staff need to be aware that emotional bullying can be more damaging than physical. Many experts say that bullying involves an imbalance of power between the perpetrator and the victim.

This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Missing from Education: A young person going missing from education is a potential indicator of abuse or neglect. Leaders in Business staff should follow the Leaders In Business's procedures for dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Any concerns should be referred to a member of the Safeguarding Team.

Looked after Child: a child who is looked after by a local authority by reason of a care order or being accommodated under section 20 of the Children Act 1989.

Care Leaver: an eligible, relevant or former relevant child as defined by the Children Act 1989.

Sexual Exploitation and Grooming: Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

Child Sexual Exploitation (CSE): is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Signs and Symptoms: go missing from home, care or education, be involved in abusive relationships, intimidated and fearful of certain people or situations, hang out with groups of older people, or antisocial groups, or with other vulnerable peers, associate with other young people involved in sexual exploitation, get involved in gangs, gang fights, gang membership, have older boyfriends or girlfriends, spend time at places of concern, such as hotels or known brothels, not know where they are, because they have been moved around the country, be involved in petty crime such as shoplifting, have unexplained physical injuries, have a changed physical appearance, for example lost weight.

Domestic Violence: The definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • Psychological • Physical • Sexual • Financial • Emotional

Drugs: This includes alcohol, tobacco, illegal drugs, medicines, new psychoactive substances ('legal highs') and volatile substances.

Fabricated or Induced Illness: There are three main ways of the parent / carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms which may include fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may include falsification of letters and documents
- Induction of illness by a variety of means

Faith Abuse: is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is

believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

Honour Based Violence (HBV): So-called 'honour based violence' encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to one of the Safeguarding Team.

Female Genital Mutilation (FGM): Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Although the age of learners at Leaders in Business is such that they are not necessarily in the high risk category for FGM, a learner may disclose that she is at risk of FGM, has suffered FGM or that a sister or family member is at risk. Leaders in Business staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The new mandatory reporting duty for FGM, introduced via the Serious Crime Act 2015, came into effect on 31 October 2015. This duty requires Leaders in Business to report known cases of FGM in under 18 year olds to the police. Signs and Symptoms: a long holiday abroad or going 'home' to visit family, relative or cutter visiting from abroad, a special occasion or ceremony to 'become a woman' or get ready for marriage, a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

Financial abuse: (taking wages or not giving money) can also be a factor.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Gangs and Youth Violence: Gang Activity - Groups of children and young people often gather together in public places to socialise, and peer association is an essential feature of most children's transition to adulthood. Groups of children and young people can be disorderly and/or anti-social without engaging in criminal activity. Young people on the periphery of becoming involved with street gangs and those young people already involved in some way can be described as 'A relatively durable, predominantly street based group of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity'.

Youth Violence: Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behaviour of a child acting individually in response to his or her particular history and circumstances. 'Serious youth violence' is defined as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19', i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. Most children and young people do not become violent overnight. Their behaviour represents many years of (increasingly) anti-social and aggressive acts.

Mental Health: Mental health problems can include depression, anxiety, eating disorders, self-harm, suicidal tendencies and the potential risk of harming others.

Youth Produced Sexual Imagery (Sexting): Making, possessing and distributing an imagery of someone under 18 which is indecent is illegal. This includes imagery created by under 18s themselves. The relevant legislation is contained in the Protection of Children Act 2004 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18. The latest guidance from the UK Council for Child Internet Safety (UKCCIS) introduces the phrase 'youth produced sexual

imagery' instead of 'sexting'. (August 2016). This guidance refers to sexual imagery and not indecent imagery as indecent is subjective and has no specific definition in law.

The type of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the police.

Handling Incidents

- All incidents involving youth produced sexual imagery should be reported to the Safeguarding Team.
- An initial review meeting will be held and subsequent interviews with the young people involved, if appropriate.
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in this process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral to the police and/or children's social care will be made at this initial stage if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent, for example due to a learning difficulty.
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's development age or are violent.
- The imagery involves sexual acts and any child in the imagery is under 13.
- There is reason to believe that a young person is at risk of harm owing to the sharing of imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply Leaders in Business may decide to respond to the incident without involving the police or children's social care. Although the sharing of sexual imagery is illegal, the National Police Chief's Council (NPCC) is clear that 'youth produced sexual imagery should be primarily treated as safeguarding issue' and the law was also created to protect children and young people and not to criminalise them. The decision to respond to the incident without involving the police or children's social care will be made when the Designated safeguarding Lead is confident that there is enough information to assess the risks to the young people involved and that the risks can be managed within the Leaders In Business's learner coaching policy.

Emotional abuse: can include constant insults and name calling, isolation from friends and family, controlling what someone wears / where they go, checking up on someone all the time (checking emails, texts, social networking sites etc) and making someone feel responsible for the abuse.

Physical abuse: can include hitting, punching, pushing, biting, kicking, using weapons etc.

Sexual abuse: can include unwanted kissing or touching, forcing someone to have sex, being made to watch pornography against their will and pressure not to use contraception.

Financial abuse: can include the taking and controlling of money, forcing someone to buy things for someone, forcing someone to work or not to work.

Trafficking: is defined as 'the recruitment, transportation, transfer, harbouring or receipt of children by means of threat, force or coercion for the purpose of sexual or commercial sexual exploitation or domestic servitude' (NSPCC). The Palermo Protocol establishes children as a special case for whom there are only two components - movement and exploitation. Any child transported for exploitative reasons is considered to be a trafficking victim - whether or not he/she has been deceived, because it is not considered possible for children to give informed consent.

A child may be trafficked without crossing any national borders, e.g. only within the UK. A child may be trafficked between a number of countries prior to being trafficked into/within the UK. The child may have entered the UK

illegally or legally (i.e. with immigration documents). The intention to exploit the child underpins the entire process.

The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery and details the different forms of exploitation that a victim of trafficking may be forced into. The exploitation can take place in a number of ways including:

- Sexual Exploitation
- Labour Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

Distinction between human trafficking and smuggling: Human trafficking does not include people smuggling, which requires the consent of the person being moved. A smuggled person is, however, a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred. Perpetrators may smuggle people with the intention of exploiting them, or with the intention of facilitating exploitation. Alternatively, the smuggled can become vulnerable to traffickers upon arrival at their destination and subsequently be exploited and/or harmed.

Financial or Material Abuse: This can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse, misappropriation of property, possessions or benefits.

APPENDIX B REFERRALS CONTACT DETAILS

For all safeguarding and Prevent concerns and referrals you must contact the Designated Safeguarding Lead (DSL), following both the safeguarding and/or Prevent referral procedure. If you are not able to contact the DSL you must contact the senior management safeguarding and Prevent representative. Failure to contact any of the above, immediately contact the local authority designated officer.

- Designated Safeguarding and Prevent Lead:

Sara Goldie – saragoldie@leadersinbusiness.net

