



Safeguarding Children and Vulnerable Adults policy

This policy covers the safeguarding arrangements in relation to people working with children and vulnerable adults. It sets out the way Eden Training meets the requirements of the **Disclosure and Barring scheme (DBS)** implemented by the **Independent Safeguarding Authority (ISA)**. Other matters relating to Safeguarding are covered by Eden Training's Child Protection policy and Protection of Vulnerable Adults policy. Our **PREVENT Procedure** is appended at **Annexe A**.

Links with other policies

- Equality policy
- Child Protection policy
- Protection of Vulnerable Adult policy
- Learners with disabilities (confidentiality) policy
- Confidential reporting policy
- Protection from Bullying and Harassment policy
- Health & Safety policy
- Drug & Alcohol policy

Eden Training takes seriously its responsibility to ensure children and vulnerable adults are safeguarded and recognises that this is a responsibility everyone shares, the safety and welfare of our learners is of the utmost importance.

Eden Training has a duty of care and a legal obligation to safeguard and promote the welfare of our learners and to respond immediately if there is a suspicion that any learner under the age of 18, or vulnerable adult, may be a victim of bullying, harassment, abuse, neglect or radicalisation.

To achieve this we have in place arrangements to minimise risk – which this policy is part of. We also have arrangements to address concerns that arise and these are covered in the Child Protection and Protection of Vulnerable Adults policies. We have decided to maintain separate policies to ensure there is clarity about what action should be taken in relation to children and young people (under 18) and in relation to adults (over 18). This is because adult and children services have different routes for referral and services.

All new teaching staff are required to complete a face to face taught session equivalent to level 3 with the safeguarding lead or deputy; there is then a workbook to complete to gain an accredited level 3 safeguarding certificate which confirms understanding of Eden Training's policies and procedures; signs and symptoms of abuse including radicalisation; referral process for safeguarding and Prevent, whistleblowing procedures. There is a requirement for mandatory annual attendance at safeguarding and Prevent update training in-house for all staff; as changes in legislation or practice occurs this will be discussed with all staff at staff meetings and a plan put in place for further training as needed.

During learners induction they are made aware of the confidential reporting procedures for safeguarding and Prevent; there are details relating to this displayed around Eden Training with information and contact details.

Visitors are made aware of safeguarding guidelines when at Eden Training, on entry they are provided with a written summary of expectations while at Eden Training; they are accompanied by a member of staff whilst on the premises when learners are present and made aware of who to discuss any safeguarding concerns with.

Eden Training operates within the requirements of the Disclosure and Barring Service (DBS) (2012).

It is a criminal offence for individuals barred by the DBS to work or apply to work with children or vulnerable adults in a wide range of posts including education and childcare. Employers also face criminal sanctions for knowingly employing a barred individual across a wider range of work.

Eden Training has always requested DBS checks for its entire staff as part of safer recruitment and before they are able to undertake direct work with learners. This is now undertaken as part of the DBS scheme. It is also checked that managers at a workplace where our learners attend also have an enhanced DBS check.

Since 2010 it has been compulsory for anyone wanting to work with children or vulnerable adults to be registered (formerly with ISA now DBS). Eden Training therefore has a legal obligation not to employ anyone who is not DBS registered.

The way we will do this is:

The responsible person within Eden Training for ensuring DBS checks are requested is the Early Years Manager.

The person responsible for ensuring no-one is employed without appropriate and satisfactory DBS check is the Managing Director, Judith Saxon

Referrals of concerns to DBS

Part of the safeguards include a duty to make referrals to the Disclosure and Barring Service where Eden Training considers it has pertinent information about a person who has caused harm or posed risk of harm to children or vulnerable adults.

The Designated Safeguarding Lead or Deputy in relation to the Child Protection policy or Protection of Vulnerable Adults policy will be responsible for deciding whether and when a referral to the DBS is appropriate.

LEGAL CONTEXT AND FRAMEWORK

Eden Training policies and procedures supplement and accord with the SET (Southend, Essex and Thurrock) procedures, which have been adopted by the Local Safeguarding Children Boards (**now Local 'Safeguarding Partners'**).

Eden Training takes into consideration the following statutory provisions:

- Children Act 1989
- Children Act 2004
- Section 175 of the Education Act 2002
- Disclosure and Barring Service 2012
- Safeguarding Vulnerable Groups Act 2006

Eden Training also follows the guidance documents:

- Working Together To Safeguard Children (HM Government, 2018).
- DfES guidance – “Safeguarding Children and Recruitment in Education” (DfES 2012)
- “What to do if you’re worried a young person or vulnerable adult is being abused” (Department of Health, 2006)
- SET Young person or vulnerable adult Protection Procedures (SET Local Safeguarding Boards, online)
- Information Sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, 2015)
- What to do if you are worried a child is being abused (HM Government, 2015)
- Keeping Children Safe in Education (2019)

Eden Training has statutory duties to assist various agencies including Local Authority, Education and Social Care with their enquiries where they reasonably suspect a young person or vulnerable adult is suffering or is likely to suffer harm and with safeguarding or promoting the welfare of a young person or vulnerable adult in all areas.

DEFINITIONS

Designated Safeguarding Lead (DSL): Managing Director – Judith Saxon

Designated Safeguarding Deputy: Early Years Manager - Nicola Dukelow-Saxon

KEY CONCEPTS

Significant harm

Under s.31 (9) of the Children Act 1989 as amended by the Adoption and Children Act 2002:

- Harm – means ill treatment, or impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill treatment of another.
- Development – means physical, intellectual, emotional, social or behavioural development.
- Health – includes physical and mental health
- Ill treatment – includes sexual abuse and forms of ill treatment, which are not physical.

Under s.31 (10) of the Act, where the question of whether harm suffered by the young person is significant on the young person’s health and development, his/her health and development shall be compared with that which could reasonably be expected of a similar young person. There are no absolute criteria on which to rely when judging what constitutes significant harm. It is the responsibility of Social Care Services to make a judgment if a referral about abuse and/or neglect of a young person falls into the criteria for a s.46 enquiry.

Abuse and neglect

Abuse and neglect are forms of maltreatment of a young person or vulnerable adult. These terms include serious physical and sexual assaults as well as cases where the standard of care does not adequately support the young person’s or vulnerable adult’s health or development.

Young people and vulnerable adults may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur within the family, in an institution or community setting or online. Abuse can occur within all social groups regardless of religion, culture, social class or financial position. Young people and vulnerable adults may be abused by those known to them or, more rarely, by a stranger. They may be abused by an adult/s or another young person/people or vulnerable adult/s.

Working Together to Safeguard Children 2018 sets out definitions and examples of the broad categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Bullying
- Radicalisation

PROFESSIONAL RESPONSE

The Designated Safeguarding Lead and Deputy

The Designated Safeguarding Lead (DSL) is responsible for the management of the Eden Training policy for safeguarding issues. The DSL and deputy will have received training in safeguarding issues and will receive refresher training at least every 2 years. The DSL and deputy will keep up to date with developments in safeguarding issues.

More specifically, the DSL / Deputy has the responsibility to/for:

- Liaising with Social Care Services, Local Safeguarding Children Boards (now, 'Safeguarding Partners'), the Police and other agencies to refer individual cases of suspected or identified abuse, neglect or such allegations
- Acting as the key contact person within Eden Training
- Knowing how to make an appropriate referral and then to liaise with local authorities to seek advice on how best to deal with specific cases
- Being responsible for co-ordinating action within Eden Training on safeguarding issues
- Where appropriate, liaising with staff to share information, but only on a 'need to know basis', to protect the rights of confidentiality
- Overseeing the planning of any provision managed by Eden Training, e.g. ensuring an effective approach to dealing with bullying and harassment
- Representing Eden Training at safeguarding meetings where appropriate
- Raising awareness about safeguarding and ensure all staff are familiar with the internal processes and receive basic training in safeguarding issues
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral)
- Liaising with agencies as appropriate
- Dealing with individual cases, including attending case conferences and review meetings as appropriate
- Where an inter-agency safeguarding plan is in place, ensuring Eden Training is involved in, if necessary, the preparation of the plan and ensuring Eden Training's role is clearly defined. This will include any involvement with the Multi-Agency Public Protection Arrangement (MAPPA)

- Ensuring that staff receive basic training in safeguarding issues and are aware of the Eden Training safeguarding processes
- Providing first-line advice to staff and learners on safeguarding matters
- Liaising to agree and implement actions relating to individual safeguarding cases
- Advising on any improvements that should be introduced to improve the procedures relating to safeguarding
- Supporting the processes of briefing and training staff on matters relating to safeguarding.

Risk Assessments

The interview process for learners is holistic and opportunities are given for the learners to discuss their personal life, individual needs and any concerns they may have; if any potential safeguarding concerns or factors are identified where additional support may be needed these are referred to Nicola Dukelow-Saxon where a vulnerability questionnaire is discussed and completed. A risk assessment may also be completed during the course if concerns or support needs are identified. When appropriate a risk assessment and support plan is put in place, concerns are shared with teaching staff on a need to know basis and outside agencies with consent from the learner, with exceptions relating to confidentiality and safeguarding as outlined in this policy.

DEALING WITH DISCLOSURE OF ABUSE & PROCEDURE FOR REPORTING CONCERNS

Confidentiality

Confidentiality is an issue which requires discussion and understanding by all those working with young people and vulnerable adults, particularly in the context of child protection. Normally, personal information should only be disclosed to third parties with the consent of the subject of that information.

Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, consent may not be possible, the safety and welfare of the child dictates that the information should be shared.

Clear boundaries of confidentiality will be communicated. Staff have a professional responsibility to share relevant information about the protection of young people and vulnerable adults with other professionals.

If a young person or vulnerable adult confides in a member of staff and requests the information is kept secret, it is important the member of staff tells the young person or vulnerable adult in an appropriately sensitive way that s/he has a responsibility to refer cases of alleged abuse to the appropriate people in Eden Training and they should be assured the matter will be disclosed only to people who need to know.

All personal information regarding a young person or vulnerable adult will be kept confidential except when:

- It is suspected that a young person under 18 years or a vulnerable adult is the victim of abuse

Acting upon a disclosure

Any member of staff who has any concern about a young person or vulnerable adult must discuss the case with the DSL or deputy immediately (at least within the same working day) so that, if necessary, a referral can be made to the relevant agency/local authority without delay.

The DSL / Deputy will collate relevant information about the case and at the earliest opportunity (normally within the same day), will take a decision about whether the case should be referred to the relevant external agency. The DSL / Deputy may discuss the case with relevant people/officer in the relevant agency to seek advice as to the appropriate action to be taken.

Where the DSL is not available, the Designated Safeguarding Deputy (DSD) will collate the relevant information and discuss the case with an external agency and organise a referral to the relevant agency if necessary.

If abuse is suspected, but not deemed relevant to refer to the relevant agency, all records must be kept in the DSL incident file.

Reporting Externally

The DSL, must report the matter by telephone as soon as possible and within 48 hours must confirm verbal and telephone referrals in writing using an interagency referral form.

If available, the following information should be provided with the referral (absence of information must not delay referral):

- Cause of concern including details of any allegations, their sources, timing and location
- Young person's current location and emotional and physical condition
- Whether the young person needs immediate protection
- Full names, date of birth and gender of young person/s
- Family address (current and previous)
- Identity of those with parental responsibility
- Names and date of birth of all household members and any known regular visitors to the household
- Details of young person's extended family or community who are significant for the young person
- Ethnicity, first language and religion of young person, parents/carers
- Any need for an interpreter, signer or other communication aid
- Any special needs of young person and other household members
- Any significant/important recent or historical events/incidents in young persons or family's life, including previous concerns
- Details of any alleged perpetrators (if relevant)
- Background information relevant to referral, e.g. positive aspects of parents care, previous concerns, pertinent parental issues e.g. mental health, domestic violence, drug or alcohol abuse, threats and violence towards professionals
- Referrer's relationship and knowledge of young person and parents/carers
- Known current or previous involvement of other agencies/professionals e.g. schools, GPs
- Parental knowledge or, and agreement to, the referral

Social Care Services will acknowledge referrals within 1 working day of receipt of the written referral. If no acknowledgement is received within 3 working days, the DSL must contact the Social Care Services again.

Investigation of a case

Individual members of staff must not investigate abuse concerns. This will be carried out if necessary by the appropriate agency and usually by Social Care and/or the Police.

Reporting concerns about non-learners

It is recognised that assessors may, from time to time, witness the unfair treatment of a young person or vulnerable adult whilst visiting learners. Eden Training has a duty of care to report incidents to relevant authorities. If a member of staff is concerned about the welfare of a young person or vulnerable adult they should contact the DSL. If deemed appropriate, the DSL will contact Social Care of the area in which the young person or vulnerable adult lives or is found (i.e. the employer's address).

Making written notes

A member of staff must make a written record of their concerns at the earliest opportunity – recording relevant facts accurately and clearly. Do not make any assumptions or confuse fact with opinion. When recording discussions that took place regarding the case, members of staff should try to record accurately what was said. Where possible, the actual words that were said should be recorded. Any notes must be given to the DSL as soon as possible to be held in the Incident file to ensure accuracy in recalling events later.

Records

The DSL will retain a copy of:

- The report
- Any notes or correspondence with the matter
- Any other relevant material
- Copies of reports, notes and all documents

Signed:	JA Saxon	Date:	6/9/2021	.
Position:	Managing Director			
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ANNEXE A:

PREVENT Procedure: Detecting and Preventing Radicalisation & Extremism

The PREVENT Procedure is intended to support staff and learners to identify those that may be at risk of radicalisation and extremism and the support that can be offered.

Background

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity.

Context

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. Colleges, and other organisations that interact with young people, should be aware of these risks and be familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

Eden Training Procedure

This procedure outlines the measures in place to reduce the risk of learners being victims of radicalisation, vulnerabilities and possible signs of concern and who staff and learners should contact with any concerns about fellow staff or learners. If, once internal processes are completed, it is considered that additional external support or referral is required this can be arranged. External support will normally involve an individual being asked to voluntarily receive tailored support from relevant external individuals or organisations.

Definition of Radicalisation

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence.” Radicalisation is the action or process of leading someone to adopt extreme/radical political, social and religious ideals and aspirations and to become a supporter of terrorism, or forms of extremism that lead to terrorism. According to The Counter Terrorism and Security Act 2015 ‘Extremism is the active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs’. Calls for death of members of the armed forces, whether in this country or overseas, are also regarded as extremist.

Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination

- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies and/or faiths

Who are we safeguarding?

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing them in.

This raises the question of what will those signs of radicalisation look like: They will look a lot like troubling behaviour:

Emotional – angry, mood swings, new found arrogance

Verbal – expressing opinions that are at odds with generally shared values, showing sympathy for extremist causes, demonstrating an intolerance/hatred of different faiths, cultures and/or sexual orientations

Physical – appearance (tattoos), change in routine

How can we safeguard against radicalisation?

We adhere to statutory guidance and ensure:

- Staff are trained to have the knowledge and confidence to identify children at risk of being drawn into terrorism
- Staff are trained to challenge extremist ideas which can be used to legitimise terrorism
- British Values are embedded and actively promoted in all areas of our work, which helps to reduce the risk of vulnerability factors which can be exploited. Examples of how we do this can be found on display boards round the college
- Staff are trained to know how to report concerns without delay
- Guest speakers are risk assessed.

We understand that terrorist groups can use the internet to exploit and target vulnerable people. We ensure that learners are educated on how to keep themselves safe when online and that filters are in place to prevent inappropriate and extremist material being accessed within the college, browsing history is periodically reviewed to ensure this is effective. Further information about e-safety can be found in the Safeguarding Children and Vulnerable Adults policy.

What to do if you believe someone to be at risk of radicalisation

Eden Training will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable.

Notice – Recognition of any changes in behaviour or appearance similar to those outlined above

Check – Speak with someone you trust like a tutor and see what they recommend but trust your instinct if you are still concerned

Share – Speak to one of the named contacts to report your concerns. Remember trust your instinct

A. If you are a **learner and concerned about another learner**, please “Check” with your tutor in the first instance and “Share” with the Safeguarding manager.

B. If you are a **learner and are concerned about a member of staff**, or a person who is not a member of Eden Training e.g. guest speakers, please “Check” with the most senior manager available and “Share” with the Safeguarding manager, or Managing Director.

C. If you are a **member of staff and are concerned about a learner**, please “Check” and “Share” with the Safeguarding manager.

D. If you are a **member of staff and are concerned about another member of staff** please “Check” with the most senior manager available and “Share” with the Safeguarding manager.

E. If you are a **member of staff and are concerned about a person who is not a member of Eden Training**, e.g. guest speaker, please “Check” and “Share” with the Safeguarding manager, or Managing Director.

Responsibility for contacting PREVENT

The Safeguarding manager is responsible for making decisions to contact the Counter-Terrorism Team at Essex Police if serious concerns are raised about a learner.

The Managing Director – Judith Saxon or Early Years Manager – Nicola Dukelow-Saxon is responsible for making the decision to contact the Counter-Terrorism Team at Essex

Police if serious concerns are raised about a member of staff or a person who is not a member of Eden Training e.g. guest speaker:

NB: As outlined in Keeping Children Safe in Education (September 2019), anyone has the right to refer to Social Care regarding any concerns for an individual. NSPCC also has a Radicalisation Helpline that can be contacted for advice. Eden Training endorses this right with regards to extremism and anyone can report a concern to Essex Police via 101.

Where this does occur please inform the Safeguarding manager with regards to a learner and the Managing Director in relation to a member of staff or member of the public who visits Eden Training.

Signed: JA Saxon **Date:** 6/9/2021 .

Position: Managing Director

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